



Transcript of the Deposition of
Douglas Johnson

Case: Douglas Johnson v. Cook County Sheriff Thomas Dart; et al.
Taken On: February 6, 2024

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOUGLAS JOHNSON,)
Plaintiff,)
-vs-) No. 22 cv 003718
COOK COUNTY SHERIFF)
THOMAS DART, in his)
official capacity;)
ANTWAUN BACON, a CCDOC)
officer; and COOK COUNTY,)
a municipal corporation,)
Defendants.)

The deposition of DOUGLAS JOHNSON, called for examination, taken via videoconference before KAREN A. FAZIO, CSR No. 84-1834, a Notary Public within and for the County of Cook, State of Illinois, and a Certified Shorthand Reporter of said state, taken pursuant to the Federal Rules of Civil Procedure of the United States District Courts pertaining to the taking of depositions, commencing at 10:00 a.m. on the 6th day of February, 2024.

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1 APPEARANCE (via videoconference):

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1 I N D E X

2 DOUGLAS JOHNSON EXAMINATION

3 BY MR. ZEID 4, 127

4 BY MR. DEVORE 112

5 BY MR. PRADOS 115

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7 E X H I B I T S

8 Defense EXHIBIT MARKED FOR ID

9 No. 1 40

10 No. 2 74

11 No. 3 90

12 No. 4 100

13 No. 5 103

14 No. 6 104

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| <p style="text-align: right;">Page 4</p> <p>1 (WHEREUPON, the witness was duly 2 sworn.) 3 MR. ZEID: All right. Let the record reflect 4 that the deposition of Douglas P. Johnson in case 5 Johnson v. Dart, et al., 22 cv 3718 has begun. 6 My name is Joel Zeid, and I represent 7 Cook County Sheriff Thomas Dart. 8 This deposition is being conducted in 9 accordance with the Rules of Federal Procedure, 10 Civil Procedure, and other local rules of the 11 Northern District. 12 It's now 10:03, and the court reporter 13 has just sworn the plaintiff in. 14 DOUGLAS JOHNSON, 15 called as a witness herein, having been duly sworn, 16 was examined and testified remotely as follows: 17 EXAMINATION 18 BY MR. ZEID: 19 Q. Mr. Johnson, can you go ahead and state 20 your full name, including your middle name, and 21 spell it for the record? 22 A. Douglas Preston Johnson, D-O-U-G-L-A-S, 23 P-R-E-S-T-O-N, J-O-H-N-S-O-N. 24 Q. Perfect. Mr. Johnson, have you ever</p> | <p style="text-align: right;">Page 6</p> <p>1 sounds like that, that won't work. Okay? 2 A. Okay. You can hear my voice, right? 3 Q. I can hear perfect right now. 4 A. Okay. 5 Q. And the court reporter will tell us any 6 time she can't hear anything. 7 If you need to take a break at any 8 point, just let me know. We can take a break. I 9 would just ask that you answer any question I ask 10 before we get up to do that. 11 Does that sound okay to you? 12 A. Okay. 13 Q. Okay. And then there are no judges 14 present. This is still a formal legal proceeding. 15 It's like testifying in court, and you're under a 16 legal obligation to tell the truth. 17 Do you understand that? 18 A. Yes, I do. 19 Q. Okay. If you don't understand any of my 20 questions, just feel free to say so, and I'll 21 rephrase it. 22 A. Okay. 23 Q. I'm going to assume that you understand 24 the questions I'm asking you unless you tell me you</p> |
| <p style="text-align: right;">Page 5</p> <p>1 participated in a deposition before? 2 A. Yes. 3 Q. Do you know when that was? 4 A. It was in 2000 -- I think it was the 5 year 2000 -- yeah, I think it was 2000. Between 6 2000 and 2001 on another case. 7 Q. Do you know the name of the case? 8 A. No, I don't know the name of the case. 9 It was concerning another injury. 10 Q. Do you know if it was, like, a civil 11 case like what we're doing now or a criminal case? 12 A. Yes. 13 Q. Yes, it was a civil case; or yes, it was 14 a criminal case? 15 A. It was a civil case. 16 Q. Okay. Well, I'm going to ask you a 17 series of questions related to your lawsuit here, 18 Johnson v. Dart, and you'll have to answer them 19 under oath. There is a court reporter present as 20 well. That's Karen. The court reporter is taking 21 everything down and will prepare a written record 22 of everything that's said, which is called a 23 transcript. So I'll need you to answer loudly and 24 with words. So, you know, an uh-huh or uhn-uhn,</p> | <p style="text-align: right;">Page 7</p> <p>1 don't. 2 Is that okay? 3 A. Yes. 4 Q. Okay. And do you have any questions 5 before we get started? 6 A. No, sir. 7 Q. Great. Then, you know, obviously, we're 8 not in the same room today. Where are you 9 currently located? 10 A. I didn't hear you. 11 Q. I'm sorry. Mr. Johnson, I said, 12 obviously, we're not in the same room right now. 13 So where are you doing this deposition from? 14 A. My house. My living room. 15 Q. Okay. And is there anybody in the 16 living room with you at this moment? 17 A. No, sir. 18 Q. Okay. And do you understand today that 19 while you're doing this deposition today remotely, 20 you're not allowed to communicate with anybody off 21 screen or be on an electronic device, like texting? 22 A. Yes. 23 Q. Okay. All right. The next few 24 questions may come across a little bit personal,</p> |

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| <p style="text-align: right;">Page 8</p> <p>1 but we just ask them as a matter of course. Okay?</p> <p>2 A. Okay. Well, if I don't want to answer</p> <p>3 it, do I have to answer it? Is it --</p> <p>4 Q. You do have to answer the question, but</p> <p>5 if there's really an issue, you can tell me, and if</p> <p>6 I need to rephrase it, I will.</p> <p>7 A. Okay. Great. Okay. Sounds good.</p> <p>8 Q. My first question is just going to be:</p> <p>9 Are there any kinds of medication you take or</p> <p>10 anything like that?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And are you taking those</p> <p>13 medications today?</p> <p>14 A. Yes.</p> <p>15 Q. What kind of medications?</p> <p>16 A. I'm taking medication for pain, for high</p> <p>17 blood pressure, for asthma, and that's -- I was a</p> <p>18 diabetic, but now I'm borderline. And I'm just</p> <p>19 taking high cholesterol medication and acid reflux</p> <p>20 medication.</p> <p>21 Q. Do you know how many milligrams, by</p> <p>22 chance?</p> <p>23 A. Which one?</p> <p>24 Q. Each respectively.</p> | <p style="text-align: right;">Page 10</p> <p>1 them are drowsy, but most of them are drowsiness,</p> <p>2 you know. And with my Singulair medication, you</p> <p>3 know, it just has me sort of, you know, jittery,</p> <p>4 but nothing serious.</p> <p>5 MR. PRADOS: I'd just advise my client to</p> <p>6 listen to the question posed or finish posing the</p> <p>7 question before he answers.</p> <p>8 BY MR. ZEID:</p> <p>9 Q. That brings me to my next question,</p> <p>10 Mr. Johnson.</p> <p>11 Do you know if any of these medications</p> <p>12 affect your memory?</p> <p>13 A. No.</p> <p>14 Q. No, you don't know; or no, they do not</p> <p>15 affect your memory?</p> <p>16 A. Say that again.</p> <p>17 Q. I said no, you don't know if they affect</p> <p>18 your memory; or no, these medications do not affect</p> <p>19 your memory?</p> <p>20 A. Well, it doesn't. To my knowledge, it</p> <p>21 doesn't.</p> <p>22 Q. Okay.</p> <p>23 A. I mean, my doctor didn't tell me that</p> <p>24 would be a side effect of any of the medications.</p> |
| <p style="text-align: right;">Page 9</p> <p>1 A. Okay. The acid reflux is -- I'm taking</p> <p>2 40 milligrams. And I'm taking for my asthma</p> <p>3 Singulair, 10 milligrams, and ANORO pump which I</p> <p>4 pump twice a day, which is 150 grams. And my</p> <p>5 rescue inhaler, Ventolin, and I will take that</p> <p>6 twice a day or as needed. And my blood pressure</p> <p>7 medication is nifedipine, 60 milligrams once a day.</p> <p>8 And Singulair, and I take that once a day at night.</p> <p>9 And the high cholesterol medication I take in the</p> <p>10 day. And I forget, I'm also on two other</p> <p>11 medications. One is warfarin because I have a</p> <p>12 history of blood clots on the calf of my legs and</p> <p>13 in my lungs, and that's 5 milligrams. And I take</p> <p>14 an aspirin which is 75 milligrams. And gabapentin,</p> <p>15 that's for nerve pain. It's supposed to control</p> <p>16 the nerves, you know, that I'm having in my body.</p> <p>17 You know, the uncontrollable nerves, you know, that</p> <p>18 I'm receiving now. And I'm taking -- for the pain,</p> <p>19 I'm taking hydrocodone, 5 grams by 325 milligrams.</p> <p>20 And just normal Tylenol, 500 milligrams, Extra</p> <p>21 Strength.</p> <p>22 Q. Okay. Do you know in general, you know,</p> <p>23 the side effects of any of these medications?</p> <p>24 A. Some of them it's -- I guess some of</p> | <p style="text-align: right;">Page 11</p> <p>1 Q. Is there anything about the medications</p> <p>2 you've taken today that would prevent you from</p> <p>3 giving us full, complete, and truthful answers to</p> <p>4 these questions?</p> <p>5 A. No, it's not.</p> <p>6 Q. Okay. Are you currently under the</p> <p>7 influence of any alcohol?</p> <p>8 A. No.</p> <p>9 Q. Are you under the influence of any</p> <p>10 drugs?</p> <p>11 A. I never used drugs besides weed.</p> <p>12 Q. Have you ever struggled with addiction</p> <p>13 in the past?</p> <p>14 A. No, not to my knowledge.</p> <p>15 Q. And you're not under the influence of</p> <p>16 weed right now, right?</p> <p>17 A. No. I haven't smoked any weed for</p> <p>18 30 years.</p> <p>19 Q. Okay. Got it. So there's nothing that</p> <p>20 would prevent you from thinking, testifying</p> <p>21 truthfully and accurately today?</p> <p>22 A. No, it's not.</p> <p>23 Q. Okay. Great. All right, Mr. Johnson.</p> <p>24 I'm going to kind of ask you about your background</p> |

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| <p style="text-align: right;">Page 12</p> <p>1 a little bit more now.</p> <p>2 Have you been known by any other names,</p> <p>3 nicknames or aliases?</p> <p>4 A. Yes. I had a nickname, Dougie Fresh.</p> <p>5 Q. And what is your date of birth?</p> <p>6 A. July 20th, 1962.</p> <p>7 Q. And do you know your Social Security</p> <p>8 number?</p> <p>9 A. Yes, I do.</p> <p>10 MR. ZEID: Okay. We can go off the record for</p> <p>11 a second.</p> <p>12 (WHEREUPON, a discussion was had off</p> <p>13 the record.)</p> <p>14 BY MR. ZEID:</p> <p>15 Q. Mr. Johnson, how tall are you?</p> <p>16 A. 5'6.</p> <p>17 Q. And how much do you weigh?</p> <p>18 A. As of today, I weigh 190 pounds.</p> <p>19 Q. Prior to your detention, what was your</p> <p>20 address?</p> <p>21 A. 2919 West Fillmore Street.</p> <p>22 Q. And was that in Chicago?</p> <p>23 A. Yes, Chicago, Illinois 60612.</p> <p>24 Q. And did you own or rent that address?</p> | <p style="text-align: right;">Page 14</p> <p>1 R-O-B-E-N-S-O-N. And I have a junior, Douglas</p> <p>2 Preston Johnson, Jr., D-O-U-G-L-A-S, P-R-E-S-T-O-N,</p> <p>3 J-O-H-N-S-O-N, J-R. And I have Lanettra Johnson,</p> <p>4 L-A-N-E-T-T-R-A, J-O-H-N-S-O-N. Jonathan Johnson,</p> <p>5 J-O-N-A-T-H-A-N, J-O-H-N-S-O-N. That completes my</p> <p>6 children.</p> <p>7 BY MR. ZEID:</p> <p>8 Q. Now would you mind sharing how old each</p> <p>9 of them are, Mr. Johnson?</p> <p>10 A. Okay.</p> <p>11 MR. PRADOS: Object to relevance.</p> <p>12 But you can answer.</p> <p>13 BY THE WITNESS:</p> <p>14 A. Okay. Well, if it's relevance, I prefer</p> <p>15 not to because I don't remember my oldest's ages</p> <p>16 exactly.</p> <p>17 BY MR. ZEID:</p> <p>18 Q. That's fair. Even though your attorney</p> <p>19 made an objection, you do still have to answer the</p> <p>20 question, but if you don't remember exactly, you</p> <p>21 know, whatever is the closest estimate you can give</p> <p>22 me to their age.</p> <p>23 A. Okay. Well, Yulda is -- I say she's</p> <p>24 about 44. Lavidia, she's 36 -- 38. Make it 38.</p> |
| <p style="text-align: right;">Page 13</p> <p>1 A. Rent.</p> <p>2 Q. Okay. And how long did you live there?</p> <p>3 A. I stayed there for approximately four to</p> <p>4 five years.</p> <p>5 Q. And are you married?</p> <p>6 A. Huh -- yes, I'm married.</p> <p>7 Q. Okay. How long have you been married?</p> <p>8 A. Two years.</p> <p>9 Q. What's your spouses name?</p> <p>10 A. Lavensis Mays.</p> <p>11 THE COURT REPORTER: Can you spell that,</p> <p>12 please?</p> <p>13 THE WITNESS: L-A-V-E-N-S-I-S. Mays, M-A-Y-S.</p> <p>14 BY MR. ZEID:</p> <p>15 Q. Mr. Johnson, do you have any children?</p> <p>16 A. Yes.</p> <p>17 Q. What are their names?</p> <p>18 A. Yulda Robenson.</p> <p>19 THE COURT REPORTER: Can you spell these for</p> <p>20 me?</p> <p>21 BY THE WITNESS:</p> <p>22 A. Okay. Yulda, L-A-Y-N-D-A -- no. I'm</p> <p>23 sorry. It's Y-U-L-D-A, Robenson, R-O-B-E-N-S-O-N.</p> <p>24 Lavidia Robenson, L-A-V-I-D-A Robenson,</p> | <p style="text-align: right;">Page 15</p> <p>1 And my son, Douglas is 36. My son -- my daughter</p> <p>2 Lanettra is 35. And Jonathan is 33.</p> <p>3 Q. Okay. And do you have grandchildren --</p> <p>4 strike that.</p> <p>5 Are any of your children dependent upon</p> <p>6 you for support at this time?</p> <p>7 A. Yeah, my youngest. That's Jonathan</p> <p>8 Johnson.</p> <p>9 Q. And do you have grandchildren,</p> <p>10 Mr. Johnson?</p> <p>11 A. Yes.</p> <p>12 MR. PRADOS: Object to relevance.</p> <p>13 But you should answer.</p> <p>14 BY THE WITNESS:</p> <p>15 A. Yes, I do.</p> <p>16 BY MR. ZEID:</p> <p>17 Q. What are their names, and I'll ask you</p> <p>18 to say if they live in Chicago or not as well?</p> <p>19 A. Okay. Because it's a lot of them. So</p> <p>20 you still want me to try to answer? Some of them I</p> <p>21 might not remember their names. I might get their</p> <p>22 names wrong.</p> <p>23 Q. Do your best, and we can always verify,</p> <p>24 but I'd like you to go ahead and answer.</p> |

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| <p style="text-align: right;">Page 16</p> <p>1 A. Okay. Yulda, she has -- wow. She has 2 four kids. One named Terianna Lane. 3 THE COURT REPORTER: I'm sorry, sir, but I'm 4 going to have to ask you to spell them for me. 5 BY THE WITNESS: 6 A. That's gonna be -- because I don't know 7 how they spell their names. They got these new 8 names, like Terianna, Tinasia, and -- you know, 9 these names, and I'm being truthful, I don't know 10 how to spell their names. 11 BY MR. ZEID: 12 Q. That's okay. 13 A. I can give their names. Is that fair 14 enough? 15 Q. Give us as best as you can. 16 MR. ZEID: And then, Karen, you know, 17 it's okay to use -- 18 BY THE WITNESS: 19 A. Terianna Lane, that's the oldest. 20 Tineea Lane, that's the middle child. Tinasia, 21 that's the third child. And Carion or Darion 22 Lane. That's her four, my oldest daughter. 23 My next oldest daughter, she has four 24 daughters. One named Shaneeka Tucker, Shaleeka</p> | <p style="text-align: right;">Page 18</p> <p>1 Q. How many of them? Can you name the ones 2 that do, or do they all live in Chicago? 3 A. They all don't live in Chicago. Some of 4 them live in Springfield. The ones that live in 5 Chicago is my daughter Davida -- Lavida, her 6 daughters: Shaneeka, Shaleeka, and Shakira, and 7 Journey. 8 And my other son -- or my other 9 daughter, her son lives in Chicago, Michael 10 Bennett. 11 And my last son, his children who I just 12 recently named, Davalia, Jada, Janell, and Jonathan 13 Jr., they all stay in the city. 14 Q. I know you said your youngest child was 15 currently dependent upon you for financial support. 16 Is there anyone else who is dependent 17 upon you? 18 A. No. 19 Q. Okay. How far in school did you go, 20 Mr. Johnson? 21 A. I have a GED. 22 Q. What school did you attend? 23 A. What did I attend? Austin High School. 24 Q. And was that in the City of Austin?</p> |
| <p style="text-align: right;">Page 17</p> <p>1 Tucker, Shakira Tucker, and Journey, and I can't 2 pronounce her last name. It's by a different dad. 3 I can't remember her name -- her last name. 4 And my other son -- wow. I can't even 5 pronounce their names. And he has two twins and 6 one child. He has three kids. And I forgot their 7 names. I'm gonna be honest with you. 8 And then my oldest daughter -- baby 9 child -- next to the baby daughter, Lanettra 10 Johnson, she has one son, and his name is Michael 11 Bennett. 12 And my last son, Jonathan Johnson, he 13 has three girls and one boy. The girl's name is 14 Davalia. Davalia Davis. Jada Johnson. And Janell 15 Johnson. And he has a junior, Jonathan Johnson, 16 Jr. 17 BY MR. ZEID: 18 Q. All right. 19 A. That completes -- 20 Q. Is that all? 21 A. Yes. 22 Q. Mr. Johnson, do any of these 23 grandchildren live in Chicago? 24 A. Yes.</p> | <p style="text-align: right;">Page 19</p> <p>1 A. Huh? 2 Q. Was that in the City of Austin? 3 A. Yes, that's in the City of Chicago. 4 Q. Got it. Okay. 5 A. And I went -- I went to Malcolm X 6 College and got my GED. 7 Q. And is Malcolm X College also in 8 Chicago? 9 A. Yes, it is. 10 Q. Okay. And you're not currently 11 incarcerated, correct? 12 A. Correct. I'm not. 13 Q. Where were you housed on July 19th of 14 2020, at the time of the incident? 15 A. 2919 West Fillmore Street. 16 Q. I apologize. Where were you housed 17 July 19, 2020, at the time of the incident? 18 A. At the time of the incident, where was I 19 living at in 2020? 20 Q. Yeah. 21 A. In 2020, I was incarcerated in the Cook 22 County Corrections. 23 Q. Okay. Were you making any money while 24 you were in jail?</p> |

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| <p style="text-align: right;">Page 20</p> <p>1 A. No, sir.</p> <p>2 Q. Okay. And how often did you talk to</p> <p>3 your family while you were incarcerated?</p> <p>4 A. Every day.</p> <p>5 Q. Who did you talk to in your family?</p> <p>6 A. I talked to my wife, my brother</p> <p>7 sometimes, and my children.</p> <p>8 Q. All your children?</p> <p>9 A. Huh? Not all of them, but some of them.</p> <p>10 Q. Which ones in particular?</p> <p>11 A. I talked to my daughter -- I talked to</p> <p>12 all of them except one -- except two. I talked to</p> <p>13 Laida, Lanetra, and Jonathan.</p> <p>14 Q. Did you talk to them about your civil</p> <p>15 case at all?</p> <p>16 A. No. I just discussed how are they</p> <p>17 doing, and they asked how I was doing. Just casual</p> <p>18 conversation.</p> <p>19 Q. Do you have any tattoos or anything?</p> <p>20 A. No.</p> <p>21 Q. Okay. And you're not presently</p> <p>22 affiliated with any gang or anything like that?</p> <p>23 A. Never did.</p> <p>24 Q. Do you have any felony convictions?</p> | <p style="text-align: right;">Page 22</p> <p>1 Q. And when was that?</p> <p>2 A. This was in 2021.</p> <p>3 Q. Okay. Have you ever been convicted of a</p> <p>4 misdemeanor involving dishonesty or a false</p> <p>5 statement?</p> <p>6 A. No -- could you strike that? I was</p> <p>7 convicted in 2023. I'm sorry.</p> <p>8 Q. You're fine. We won't strike it, but</p> <p>9 the record --</p> <p>10 A. I'm sorry. '22.</p> <p>11 Q. '22?</p> <p>12 A. '22.</p> <p>13 Q. So after the incident?</p> <p>14 A. Right.</p> <p>15 Q. Got it. Okay. Have you ever testified</p> <p>16 in court before?</p> <p>17 A. Once.</p> <p>18 Q. And, I'm sorry, Mr. Johnson. What was</p> <p>19 that second conviction for again, that felony</p> <p>20 conviction you mentioned?</p> <p>21 A. It was a danger to a youth.</p> <p>22 Q. Danger to a youth. Okay. I'm sorry.</p> <p>23 And then what -- so you testified in</p> <p>24 court before. Was that in both of your criminal</p> |
| <p style="text-align: right;">Page 21</p> <p>1 A. Yes.</p> <p>2 Q. For what were you convicted?</p> <p>3 MR. PRADOS: Did you pose a question? I</p> <p>4 didn't hear.</p> <p>5 BY MR. ZEID:</p> <p>6 Q. I apologize. I said for what were you</p> <p>7 convicted?</p> <p>8 A. I was -- the first one I was convicted</p> <p>9 for drugs.</p> <p>10 Q. Okay. When was that?</p> <p>11 A. Which weren't mine. Huh?</p> <p>12 Q. When was that first conviction?</p> <p>13 A. That was the first conviction. This was</p> <p>14 in 1998.</p> <p>15 Q. Okay.</p> <p>16 MR. PRADOS: Again, I urge my client to let</p> <p>17 counsel finish his question before he answers, to</p> <p>18 help out the court reporter.</p> <p>19 BY MR. ZEID:</p> <p>20 Q. Now you said you had another conviction</p> <p>21 as well, a felony conviction?</p> <p>22 A. Yes.</p> <p>23 Q. What were you convicted of for that one?</p> <p>24 A. A danger to a youth.</p> | <p style="text-align: right;">Page 23</p> <p>1 convictions?</p> <p>2 A. I testified -- when you said -- you said</p> <p>3 testify for someone else?</p> <p>4 Q. Yeah, or testify for someone else.</p> <p>5 A. That's what I thought. I testified for</p> <p>6 someone one time, a very long time ago, and I</p> <p>7 testified on my own behalf.</p> <p>8 Q. Do you remember what case that was for</p> <p>9 or who it was for?</p> <p>10 A. Which one? It was -- I forgot his name.</p> <p>11 He was an associate, you know. His last name was</p> <p>12 Holmes.</p> <p>13 Q. Do you remember what the case was about?</p> <p>14 A. It was a drug case.</p> <p>15 Q. And Mr. Holmes was being charged with</p> <p>16 drugs in this case?</p> <p>17 A. Yes.</p> <p>18 MR. PRADOS: Objection to relevance.</p> <p>19 But over that objection, you can and</p> <p>20 should answer. Even though I'm objecting, you</p> <p>21 still have to answer.</p> <p>22 BY THE WITNESS:</p> <p>23 A. Okay. I answered it yes.</p> <p>24</p> |

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| <p style="text-align: right;">Page 24</p> <p>1 BY MR. ZEID:</p> <p>2 Q. Other than this lawsuit, how many other</p> <p>3 lawsuits have you filed?</p> <p>4 A. Maybe about -- maybe three. Two of them</p> <p>5 was -- the first one was I fell down some stairs,</p> <p>6 slumlord. And then an automobile accident. And</p> <p>7 the last one was within the correctional center.</p> <p>8 Q. Okay. And aside from being a witness in</p> <p>9 that one case you testified about earlier and these</p> <p>10 other civil suits that you just mentioned, have you</p> <p>11 been involved in any other civil lawsuit?</p> <p>12 A. No.</p> <p>13 Q. Okay. Mr. Johnson, we're going to kind</p> <p>14 of go now to your medical history here. So I'm</p> <p>15 going to ask you some questions about your medical</p> <p>16 history prior to incarceration.</p> <p>17 Prior to your incarceration, did you</p> <p>18 drink at all?</p> <p>19 A. Did I drink? Yeah, occasionally.</p> <p>20 Q. Okay. And I know you said that you</p> <p>21 smoked cannabis a while ago.</p> <p>22 Was that a frequent thing you did or</p> <p>23 just once? Could you elaborate?</p> <p>24 A. When that was 30 years ago?</p> | <p style="text-align: right;">Page 26</p> <p>1 A. I had developed blood clots -- massive</p> <p>2 blood clots around my heart, about to kill me. And</p> <p>3 this was in June of 2021. And I had to go to the</p> <p>4 hospital. You know, I thought it was a heart</p> <p>5 attack, but it wasn't. It was three massive blood</p> <p>6 clots. So I had to be in the hospital for a while.</p> <p>7 I was near death.</p> <p>8 Q. Have you ever undergone treatment for</p> <p>9 mental health?</p> <p>10 A. No.</p> <p>11 Q. Okay. Have you had an ongoing pain</p> <p>12 anywhere on your body that you did not seek medical</p> <p>13 attention for?</p> <p>14 A. No.</p> <p>15 Q. While incarcerated, did you drink any</p> <p>16 alcohol?</p> <p>17 A. No.</p> <p>18 Q. Have you done anything to prepare for</p> <p>19 today's deposition, Mr. Johnson?</p> <p>20 A. No.</p> <p>21 Q. Did you -- you didn't talk to anybody?</p> <p>22 A. No.</p> <p>23 Q. You didn't review any documents?</p> <p>24 A. No. I don't have any documents with me.</p> |
| <p style="text-align: right;">Page 25</p> <p>1 Q. That was it, 30 years ago?</p> <p>2 A. Yeah, because my asthma -- it affected</p> <p>3 my asthma, and my doctors requested that I quit.</p> <p>4 So I followed my doctors' orders.</p> <p>5 Q. Okay.</p> <p>6 A. You know, and I feel pretty good because</p> <p>7 that was smoke -- that was the only smoke that was</p> <p>8 going in my lungs. I never smoked cigarettes.</p> <p>9 Q. Prior to your incarceration, had you</p> <p>10 ever had surgery done?</p> <p>11 A. Prior to my incarceration, yes, on my</p> <p>12 back.</p> <p>13 Q. Do you know when that was?</p> <p>14 A. June 30th, 2016.</p> <p>15 Q. Okay. And what was wrong with your</p> <p>16 back?</p> <p>17 A. The first -- I had a slipped disc,</p> <p>18 aggravated disc. It was due to an accident -- car</p> <p>19 accident.</p> <p>20 Q. Have you ever been hospitalized prior to</p> <p>21 your incarceration, aside from that surgery to your</p> <p>22 back that you mentioned?</p> <p>23 A. Yes. I've been hospitalized, yes.</p> <p>24 Q. Do you know what the cause of that was?</p> | <p style="text-align: right;">Page 27</p> <p>1 Q. Okay. All right. Then I'm going to go</p> <p>2 ahead and turn your attention to July 19, 2020.</p> <p>3 That's the day of the incident that's the cause of</p> <p>4 this lawsuit. And I just generally want you to</p> <p>5 kind of walk through your whole day, what happened</p> <p>6 to you on that day.</p> <p>7 MR. PRADOS: Object to form because it calls</p> <p>8 for a narrative answer.</p> <p>9 But you can answer.</p> <p>10 BY THE WITNESS:</p> <p>11 A. Well, I was just going throughout my</p> <p>12 day, you know, waiting on my visit. And when I was</p> <p>13 called for my visit, I went to the door. The</p> <p>14 officer on the deck, he opened up the door, and</p> <p>15 escorted me to the outside, to Officer Bacon. And</p> <p>16 he went back inside the tier. And Officer Bacon,</p> <p>17 well, he seemed a little agitated, and he pulled</p> <p>18 his handcuffs out.</p> <p>19 So when he pulled his handcuffs out, I</p> <p>20 was explaining to him that I don't get handcuffed</p> <p>21 because I was told by the medical physician anyone</p> <p>22 that has the device that helps their mobility don't</p> <p>23 get cuffed. And I never got cuffed. And I</p> <p>24 explained to him my condition of my back, and that</p> |

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| <p style="text-align: right;">Page 28</p> <p>1 was the reason. And he was just saying, well, I 2 don't want a hear that. You're gonna get cuffed 3 today. 4 So he proceeded to put the handcuffs on 5 me, and I told him that they were tight. And I 6 told him that I don't know how I'm going to be able 7 to walk. And he told me that I have to do it the 8 best way I can. So I'm walking with the handcuffs 9 on top of my wrists, squeezing the bones of my 10 wrists. And I'm stumbling. We went to the 11 elevator, went down the elevator. Then that's 12 where the very long journey began. And I stumbled 13 twice, and he just looked back at me with a smirk 14 on his face, you know, and turned back around and 15 kept walking. 16 And as we went through these iron doors, 17 then there was hallways -- long hallways. So I 18 started leaning up against the hallway wall, you 19 know, to try to take some pressure off, which it 20 wasn't working, but I guess it prevented me from 21 falling down. And I said, could he loosen the 22 handcuffs because they were too tight. And he 23 said, no. The blank handcuffs ain't too tight. I 24 can come and put my whole hand through it. And I</p> | <p style="text-align: right;">Page 30</p> <p>1 take a break. 2 MR. ZEID: It's no big deal. We'll take five 3 minutes. We'll be back at 10:45. Okay? 4 THE WITNESS: Okay. 5 MR. ZEID: You can always say if you need one. 6 No worries. Let's go off the record. 7 (WHEREUPON, a recess was had.) 8 MR. ZEID: It's now 10:45. We're going to go 9 back on the record. 10 BY MR. ZEID: 11 Q. Mr. Johnson, you were just telling us 12 about what happened to you on July 19th, 2020, and 13 you had just gotten to the part of the incident 14 where you were at the stairs, I believe. 15 A. Yes. I was at the stairs, and I thought 16 he was gonna unhandcuff me so I can grab the bar 17 and come up the stairs. But he didn't. He just 18 told me I need to get up there the best way I can 19 if I want my visit. 20 So I proceeded to struggle up the stairs 21 with my handcuffs and my cane and grabbing the bar 22 to hold on to get up the stairs. 23 Once I made it up the stairs, I proceed 24 out the door for my visit. I seen a supervisor, a</p> |
| <p style="text-align: right;">Page 29</p> <p>1 told him, no, you can't. And he said, don't worry 2 about it. Just come on. 3 So we taking steps. Every maybe 10 or 4 15 steps, he would turn around and look at me with 5 this crazy smile on his face, you know. And I'm 6 sweating, and I'm in pain because I told him the 7 cuffs was causing a lot of pain because I've got -- 8 I've got my cane, and I'm walking with my cane to 9 keep my mobility so I won't fall because of my back 10 injury. And he just, come on, you know. And he 11 did that like about three more times. 12 Then we finally got to Division 1 13 because that's where the visitors was at. That's 14 where the visiting site was at, in the yard 15 outside. And there was like four steps that I had 16 to go up the stairs, and I thought that he was 17 gonna unloose the handcuffs where I can hold on to 18 the railing, and he just looked at me and told me 19 to go up the stairs. So I had to struggle up the 20 stairs with my cane. 21 You gotta excuse me, man. 22 Q. Do you need a couple of minutes? 23 Mr. Johnson? 24 MR. PRADOS: We can take a quick -- we can</p> | <p style="text-align: right;">Page 31</p> <p>1 white shirt. I didn't know who she was, but I 2 stopped her, and I explained to her or tried to 3 explain to her about my condition and the 4 handcuffs, and she said she don't want to hear it. 5 It's a rule. And she kept walking, you know. 6 So Officer Bacon told me to go off to my 7 visit. So I went -- proceeded to go to my visit, 8 and that was a long walk because I was way on the 9 end of the park area. You know, I'd say it was 10 around a block long. And my family was waiting on 11 me, and they seen the expression on my face, and 12 they looked at my hands and they seen that my hands 13 was swollen. And I told them that it's because of 14 the cuffs and trying to make it to my visit. 15 So I proceeded with my visit, still in 16 my handcuffs. You know, I was in a lot of pain, 17 but I was still trying to talk to my family because 18 the visit was 20 to 30 minutes. 19 And after the visit, I proceed -- I 20 waited until Officer Bacon came to pick me up 21 because he's the one that escorted me. And the 22 same routine going down the stairs. Bad attitude, 23 very rude. Struggled down the stairs, and 24 proceeded back down the hall going to my tier, to</p> |

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| <p>1 Division 8 from Division 1. 2 And we gets halfway there, and I'm 3 sweating. My mask got wet, and I can hardly 4 breathe out the mask. And I asked him can I get 5 another mask because this one is wet and I can 6 barely breathe. He tells me no. Just put the mask 7 back on and come on. And I proceed going down the 8 hall struggling to my tier, as he looking back with 9 the same expression on his face like I was some 10 type of a wild animal or something else. 11 When we got to the tier, he just looked, 12 and he smiled and took the handcuffs off and left. 13 By then, the tier officer where I was on, my deck, 14 he opened the door for me to come in, but I pulled 15 my mask down and asked him for another mask because 16 the mask was soaking wet. And I hit my pump two 17 times, and I came in the tier, and I went there 18 into the bathroom, and I started putting cold water 19 on my hands because they was burning and hurting 20 and red and swelling. 21 Then I seen that it wasn't really giving 22 me too much relief. I wiped my hands off, and I 23 wiped my face because I was doing the same thing 24 that I was just doing a few minutes ago, crying.</p> | <p>1 assured me that she was gonna track Officer Bacon 2 down and discipline him. But I don't know whether 3 he was disciplined or not because no word got back 4 to me that he was being disciplined. So I just 5 left it up to that and took her word for it. 6 Q. I appreciate you kind of running through 7 that day. I didn't mean to interrupt you, 8 Mr. Johnson. Is there anything else? 9 A. No, there's nothing else. It's just my 10 wrist got worse, and I requested a doctor, which I 11 had put in a form, a medical slip, and wait until 12 I'm called for the doctor, which that took a week. 13 So I'm sitting here struggling, still hurting, 14 wrist is swelling up, and waiting on a doctor to 15 see me. And when I finally got called to see the 16 doctor, you know, I went and seen the same doctor 17 that I've been seeing for my back and everything. 18 And I showed it to him, and he looked distorted 19 because he seen how swollen my wrist was all around 20 the top and took my veins in in the front, which 21 the swelling is still there, right here 22 (indicating). I don't know if you can see it or 23 not, but it's there. 24 Q. You're pointing to the -- to your wrist,</p> |
| Page 33 | Page 35 |
| <p>1 I went to Officer Orr because that was 2 the officer on the deck. I showed him my wrists 3 and everything, what Officer Bacon done, and I 4 requested a supervisor. He immediately called for 5 a supervisor. She came, Sergeant Parcell, and I 6 showed her my wrists. My right wrist had the 7 swelling so bad it turned red, and all the back of 8 my hand. And she looked at it, and then she got 9 the nurse, and the nurse gave me two Tylenol to 10 take. And I explained to her my situation, what 11 was going on. And she told me not to worry about 12 it. She was gonna go look for this Officer Bacon, 13 and he was gonna be disciplined. And she requested 14 I fill out a grievance, and that's what I did. 15 And I did that, and I laid down for that 16 day. But then the next morning, Sergeant Parcell 17 called me back to the door, and with her -- she had 18 the superintendent with her, and her name was 19 Hayes. And I proceed to show her my wrist, and she 20 asked me the officer's name, and I gave her the 21 officer's name. And she assured me that he will be 22 disciplined. And her herself requested that I fill 23 out a grievance. And I told her that I already 24 did, and she said that's good. And she just</p> | <p>1 and just kind of -- 2 A. Right here, yes. Right below my thumb. 3 Right here. And he said he was gonna send me to do 4 some tests. So I had to wait until I was called to 5 go to Stroger's. And the specialist there name was 6 Lombardi. Lombardi or Lambardi. And he looked at 7 my hand and he examined it. He sent me for some 8 tests. And then he came I guess a month later. He 9 informed me that he needed to do surgery on me 10 called a carpal tunnel. That's what he called it. 11 And he did the surgery. It was on -- I think it 12 was the end of March. 13 And after that, I still was in a great 14 deal of pain. He gave me a prescription for pain 15 medication, but the pain medication that he 16 prescribed me for, it wasn't allowed. So they gave 17 me Tylenol 3, but then all of a sudden, there was 18 4 -- I was supposed to take it until my next visit, 19 but after a week, they discontinued. They just 20 stopped it. And I'm asking to try to see the 21 doctor so I can explain to the doctor how long I 22 supposed to be on the medication. So I'll suffer 23 with only the pain medication that I was getting 24 for my back, which was tramadol and some regular</p> |

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| <p style="text-align: right;">Page 36</p> <p>1 Tylenol.</p> <p>2 When I went back to see Officer -- I</p> <p>3 mean, Dr. Lombardi, he looked at it, and he sent me</p> <p>4 back because he said the stitches wasn't ready to</p> <p>5 come out. So I had to go back and wait another</p> <p>6 week before I come back to him before he took the</p> <p>7 stitches out. He said the swelling was gonna go</p> <p>8 down, but the swelling didn't never go down. So I</p> <p>9 was still in a great deal of pain because he did</p> <p>10 tell me, the back of your hand, you may not get the</p> <p>11 feeling back in your hand, and I won't be able to</p> <p>12 get rid of all of the nerve pain that you gonna</p> <p>13 have, but I'm gonna try to get rid of as much as I</p> <p>14 can.</p> <p>15 He cut me in three places: On the top</p> <p>16 of my wrist by my thumb, he cut me here, and he cut</p> <p>17 me in the middle of my hand. And I've been</p> <p>18 struggling with it.</p> <p>19 And when I got out, I immediately called</p> <p>20 for -- I went to my doctor, and she sent me to a</p> <p>21 specialist. And his name was Dr. Mikhail</p> <p>22 (phonetic). And once he ran all the tests and he</p> <p>23 figured out that there was a lot of damaged nerve</p> <p>24 up here that should have been located and noticed</p> | <p style="text-align: right;">Page 38</p> <p>1 Officer Bacon as a defendant in this case.</p> <p>2 Could you please tell me your history</p> <p>3 with him prior to July 19, 2020?</p> <p>4 A. I never had any history with him. That</p> <p>5 was my first time ever seeing him in my life.</p> <p>6 Q. And no prior interactions with him other</p> <p>7 than --</p> <p>8 A. No prior, no.</p> <p>9 Q. Obviously, you know, after this</p> <p>10 incident, how do you feel about Officer Bacon?</p> <p>11 A. Well --</p> <p>12 MR. PRADOS: Object to form.</p> <p>13 You can answer.</p> <p>14 BY THE WITNESS:</p> <p>15 A. I don't hate him because I wasn't raised</p> <p>16 to hate anyone, but I was very disappointed in the</p> <p>17 way that I was treated by him, the way he just</p> <p>18 abused his authority, you know, towards me, and</p> <p>19 acted like I wasn't nothing. You know, he was very</p> <p>20 prejudiced. And at one point I felt that he was</p> <p>21 being racist, you know. But it's just the way that</p> <p>22 I was treated, and he was very rude from the</p> <p>23 beginning all the way to the end. He didn't care</p> <p>24 about the pain that I was in, the situation or</p> |
| <p style="text-align: right;">Page 37</p> <p>1 when I was getting all the tests run for me at</p> <p>2 Stroger's. And he told me, well, I'm gonna have to</p> <p>3 do a surgery for the nerves. And he say, well, the</p> <p>4 swelling should go down, but I'm not 100 percent</p> <p>5 guaranteed. And he did the surgery here, and sent</p> <p>6 me for therapy after that.</p> <p>7 Q. Thank you for sharing all that,</p> <p>8 Mr. Johnson. That was a lot to kind of run</p> <p>9 through, so we'll go over bits and pieces of it in</p> <p>10 detail here.</p> <p>11 I just want to go back to earlier. When</p> <p>12 we went off the record, I know there was somebody</p> <p>13 who comforted you. I want to make sure there's</p> <p>14 nobody in the room.</p> <p>15 A. I guess that emotion, you know, came,</p> <p>16 and she just came down, you know. I guess I</p> <p>17 probably would have did the same thing. So I'm</p> <p>18 not -- I probably would have did the exact same</p> <p>19 thing.</p> <p>20 Q. I just wanted to make sure no one was in</p> <p>21 the room with you currently.</p> <p>22 A. Everybody's gone. I let her know I'm</p> <p>23 okay, what was wrong, and she's gone.</p> <p>24 Q. Now, Mr. Johnson, you named</p> | <p style="text-align: right;">Page 39</p> <p>1 anything. He didn't even try to see was the</p> <p>2 handcuffs too tight, was there any way that he</p> <p>3 could make it comfortable. He didn't even do that.</p> <p>4 And at the beginning, I explained to him</p> <p>5 before we proceeded was that I was also on a</p> <p>6 wheelchair long-distance escort, and he didn't even</p> <p>7 care about that. You know, he didn't go to see was</p> <p>8 there any wheelchairs available or anything. He</p> <p>9 just put the handcuffs on me and just say, come on.</p> <p>10 Being very rude. And to this day, it bothers me</p> <p>11 every time I talk about him.</p> <p>12 Q. Have you had any interactions with him</p> <p>13 since July 19th?</p> <p>14 A. No interaction at all, period. Because</p> <p>15 he was upset because basically he was took from</p> <p>16 one, I guess, tier or post and assigned to escort</p> <p>17 the detainees. And he made it known that he didn't</p> <p>18 want to be doing this. He wished that it would</p> <p>19 have kept storming so he could have canceled the</p> <p>20 whole thing. That's how he was talking to me,</p> <p>21 loudly, in a rage, upset about the situation that</p> <p>22 he had to do. You know, and that was supposed to</p> <p>23 have been his job.</p> <p>24 Q. I appreciate you kind of sharing that</p> |

12 (Pages 36 to 39)

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| <p style="text-align: right;">Page 40</p> <p>1 with me.</p> <p>2 I'm going to go ahead and introduce what</p> <p>3 will be marked as Defense Exhibit 1, and it will be</p> <p>4 the complaint you filed in this case.</p> <p>5 (WHEREUPON, a certain document was</p> <p>6 marked Defense Exhibit No. 1, for</p> <p>7 identification, as of 2-6-24.)</p> <p>8 BY MR. ZEID:</p> <p>9 Q. I'm going to go ahead and put it on my</p> <p>10 screen right now, Mr. Johnson. Just let me know if</p> <p>11 you can see it, okay?</p> <p>12 You should be able to see this exhibit</p> <p>13 here.</p> <p>14 A. Yes, I can see it.</p> <p>15 Q. Perfect. I'm just going to scroll</p> <p>16 through it very slowly, just to make sure you can</p> <p>17 see the whole document. Let me know if I'm going</p> <p>18 too fast, okay?</p> <p>19 A. Okay. Yeah, you way too fast.</p> <p>20 Q. Okay.</p> <p>21 A. Could you come back to the other page?</p> <p>22 Q. Yeah, absolutely. I'll go to Page 2,</p> <p>23 and you just tell me when you're ready for me to</p> <p>24 scroll down.</p> | <p style="text-align: right;">Page 42</p> <p>1 Q. Okay. This document was filed on</p> <p>2 July 18th, 2022?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And then I'll show you the final</p> <p>5 page again.</p> <p>6 Do you see the signature here,</p> <p>7 Mr. Johnson?</p> <p>8 A. Yes.</p> <p>9 Q. This is Page 12 of the exhibit, and it's</p> <p>10 signed, Richard Dvorak. Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And are you represented by</p> <p>13 Richard Dvorak?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Okay. So did you help write this</p> <p>16 document?</p> <p>17 A. No.</p> <p>18 Q. Were you involved in its preparation at</p> <p>19 all or in sharing the allegations of the complaint?</p> <p>20 MR. PRADOS: Objection to form.</p> <p>21 You can answer.</p> <p>22 BY THE WITNESS:</p> <p>23 A. Yes, I -- we talked about the -- I made</p> <p>24 the complaint -- making the complaint against the</p> |
| <p style="text-align: right;">Page 41</p> <p>1 A. Okay. I'm trying to stretch it out a</p> <p>2 little bit.</p> <p>3 Q. I can also zoom in for you, Mr. Johnson.</p> <p>4 A. Okay. You can scroll up some. You can</p> <p>5 scroll some more. You can scroll some more.</p> <p>6 Q. All right. This is going to be the</p> <p>7 start of Page 3.</p> <p>8 A. Okay.</p> <p>9 Q. I don't want to make you read everything</p> <p>10 line-by-line. I just want to make sure you're</p> <p>11 familiar with the document. You're welcome to read</p> <p>12 it all, but I just --</p> <p>13 A. Okay. I'm familiar with the document</p> <p>14 there. I'm familiar with it.</p> <p>15 Q. I just wanted to make sure you could see</p> <p>16 the whole thing.</p> <p>17 A. I read going on. I'm familiar with</p> <p>18 that.</p> <p>19 Q. Okay. I'm going to scroll all the way</p> <p>20 to the bottom so you can see the whole exhibit from</p> <p>21 start to finish. And then this is the last page.</p> <p>22 So, Mr. Johnson, is this a true and</p> <p>23 accurate copy of your complaint?</p> <p>24 A. Yes.</p> | <p style="text-align: right;">Page 43</p> <p>1 defendant.</p> <p>2 BY MR. ZEID:</p> <p>3 Q. And as you sit here today, do you stand</p> <p>4 by the allegations made in this complaint?</p> <p>5 A. Yes, I do.</p> <p>6 Q. Okay. So everything is true?</p> <p>7 A. Yes.</p> <p>8 Q. Mr. Johnson, why were you being taken</p> <p>9 for visitation on the day of July 19th, 2020?</p> <p>10 A. Because my tier was scheduled -- was all</p> <p>11 day to go to the visits. So they called people one</p> <p>12 at a time that's name was on the visiting list to be</p> <p>13 escorted to their visitor.</p> <p>14 Q. What time were you taken out of your</p> <p>15 cell to go to visitation?</p> <p>16 A. It was sometime -- I don't know the</p> <p>17 exact time, but it was in the afternoon. Maybe --</p> <p>18 between -- say between 3:00, 4:00 o'clock. It was</p> <p>19 something like that. I can't give you an accurate</p> <p>20 time.</p> <p>21 Q. That's okay. That's a good estimate.</p> <p>22 Could you tell me what you were doing</p> <p>23 during that day prior to that afternoon time you</p> <p>24 were taken for your visit?</p> |

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| <p style="text-align: right;">Page 44</p> <p>1 A. Well, I was just sitting on my bunk 2 watching TV. 3 Q. And did you -- 4 A. Go ahead. 5 Q. I was going to say, did you have a mask 6 on when you were in your cell? 7 A. No, I didn't have a mask on. We just 8 only get a mask when we being taken out, you know. 9 Q. Did you have a cane with you at that 10 point? 11 A. Yes, I walked with a cane at all times. 12 Q. Okay. Now when you were taken to your 13 visit, did Officer Bacon come and grab you out of 14 your cell? 15 A. No, he did not. 16 Q. Okay. So how did you get taken to your 17 visit at the start? 18 A. My name was called by the tier 19 officer -- 20 Q. Okay. 21 A. -- that it was time for my visit. So I 22 proceeded to go to the door. Once I got to the 23 door, he opened the door and let me out the door to 24 Officer Bacon. And then he closed the door.</p> | <p style="text-align: right;">Page 46</p> <p>1 and he just said that he didn't want to hear that, 2 he wasn't trying to hear it. He was trying to see 3 how he gonna put the handcuffs on, you know. 4 Looking at my wrist and looking at the cane, you 5 know. So then he just say forget it, and he just 6 put them on me real tight and told me to come on. 7 Q. So he put the handcuffs on you at this 8 point, and were they in the front or behind you? 9 A. They were in the front. I wouldn't have 10 been able to walk at all if they were behind me 11 because I wouldn't be able to hold my cane. But he 12 put them on me, and they were tight, and I'm 13 telling him that I'm not supposed to get 14 handcuffed, but he didn't care. He just said, come 15 on, let's go. And then we going down the elevator 16 and talking, and I'm telling him it's too tight. 17 And he turned around and tell me the handcuffs 18 ain't tight because he could come over and put his 19 whole damn hand in there, you know. And I told him 20 that that was not true. I mean, you could come and 21 do it. And he said, just come on. 22 Q. At this point, when you guys were having 23 this discussion, where in the walk to visitation 24 were you?</p> |
| <p style="text-align: right;">Page 45</p> <p>1 Q. Okay. And at that point you were still 2 not handcuffed? 3 A. I was not handcuffed yet. 4 Q. Okay. And you didn't have a mask on at 5 this point? 6 A. Yes, I had a mask on then. 7 Q. So they put a mask on you as you were 8 being taken out of the tier, and then -- 9 A. Exactly. 10 Q. Okay. And then once you got through the 11 door, Officer Bacon was there? 12 A. Yes. After I got out of the door, he 13 was standing there with the handcuffs. 14 Q. Okay. So he put these handcuffs on you 15 right after that? 16 A. Not exactly right after that. You know, 17 he was looking at me while I had my cane, you know, 18 and holding the handcuffs. And while he was doing 19 that, I was explaining to him that I don't get 20 handcuffed because anybody that has a mobility, is 21 required to get a cane, and they don't get 22 handcuffed. And I was also on a long-distance 23 wheelchair escort, and we were going long distance. 24 So once I got finished telling him that,</p> | <p style="text-align: right;">Page 47</p> <p>1 A. We had went through the iron doors, and 2 we was proceeding down the long halls trip. It's a 3 very long haul through the County. Lots of turns, 4 lots of halls. We was proceeding down the hall 5 going towards, you know, Division 1 because that's 6 where visitation was, in Division 1. 7 Q. Mr. Johnson, when he put the handcuffs 8 on you, were you holding your cane in front of you? 9 A. My cane was next to me. He told me, 10 give me your hands. So I already explained to him 11 what's going on, that he didn't care. Like he 12 said, you gonna get handcuffed today. So he 13 handcuffed me and told me to come on. So when he 14 put the handcuffs on me, then I grabbed my cane 15 because my cane is that I need it to balance, and I 16 was struggling going to where we need to go. 17 Q. So were you holding your cane in your 18 right or your left hand when you were handcuffed? 19 A. I was holding it in my right hand. 20 Q. Okay. And are you right-handed? 21 A. Yes, I'm right-handed. 22 Q. Okay. I'm going to ask you some 23 questions about this cane that you had with you. 24 What was the body of the cane made out</p> |

14 (Pages 44 to 47)

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| <p>1 of?</p> <p>2 A. It was made out of wood. It was issued</p> <p>3 to me by the County.</p> <p>4 Q. Do you know what the handle was made out</p> <p>5 of?</p> <p>6 A. It was made out of wood.</p> <p>7 Q. Okay.</p> <p>8 A. It was a wooden cane from top to bottom.</p> <p>9 Q. How tall is the cane?</p> <p>10 A. I'd say it was maybe about four feet. I</p> <p>11 guess it was to my waist. A little bit under my</p> <p>12 waist. Three, four feet. I have to say four feet.</p> <p>13 Q. Do you know how much the cane weighed?</p> <p>14 A. I guess maybe -- I'd say maybe a pound.</p> <p>15 Maybe a pound or less.</p> <p>16 Q. Was it heavy for you to use?</p> <p>17 A. No, it wasn't heavy for me to use.</p> <p>18 Q. There was a rubber point at the end?</p> <p>19 A. Yes, it was.</p> <p>20 Q. Okay. Could that rubber cap come off?</p> <p>21 A. Probably it could have, but I never</p> <p>22 removed it.</p> <p>23 Q. Do you still have the cane today?</p> <p>24 A. Yes, I do.</p> | <p>1 handcuffs are just putting pressure as I'm trying</p> <p>2 to walk, and I'm up against the wall, and that's</p> <p>3 how I'm walking down the hall.</p> <p>4 Q. And at the end of the hallway, is that</p> <p>5 where the stairs are?</p> <p>6 A. Yes, that's where the stairs are. In</p> <p>7 Division 1, the stairs is to go outside into the</p> <p>8 yard.</p> <p>9 Q. Okay. So you were leaning against the</p> <p>10 wall while you were handcuffed, kind of walking</p> <p>11 along this long hallway until you got to the</p> <p>12 stairs, correct?</p> <p>13 A. Yes.</p> <p>14 Q. What happened when you got to the</p> <p>15 stairs?</p> <p>16 A. When I got to the stairs, I stopped, and</p> <p>17 I turned to him. I thought he was gonna take the</p> <p>18 handcuffs off while I can hold on to the bannister</p> <p>19 to walk up the stairs, but he didn't do that. He</p> <p>20 walked past me, and he walked up the stairs and</p> <p>21 told me you got to get up here the best way you</p> <p>22 can. So I just looked at the stairs for a while,</p> <p>23 and then I practically grabbed on to my cane, and I</p> <p>24 clamped my hand in between the pole, and I pulled</p> |
| Page 49 | Page 51 |
| <p>1 Q. Okay.</p> <p>2 MR. PRADOS: Can we take a quick five-minute</p> <p>3 break, please?</p> <p>4 MR. ZEID: Yeah, that's fine with me.</p> <p>5 MR. PRADOS: As moderator -- or host, can you</p> <p>6 mute everybody?</p> <p>7 MR. ZEID: Yeah, I can mute everybody. I'm</p> <p>8 going to stop my screen sharing and go off the</p> <p>9 record.</p> <p>10 (WHEREUPON, a recess was had.)</p> <p>11 BY MR. ZEID:</p> <p>12 Q. Mr. Johnson, you just finished</p> <p>13 describing the cane a little bit that I was asking</p> <p>14 you about before we went on our break.</p> <p>15 A. Uh-huh.</p> <p>16 Q. So after -- you know, after you got</p> <p>17 cuffed and you're holding the cane in your right</p> <p>18 hand and you guys walk down this long hallway past</p> <p>19 these metallic doors, what happened?</p> <p>20 A. Well, I stumbled a couple of times, and</p> <p>21 he just turned around, looked at me, and just kept</p> <p>22 on walking. So that's when I had to figure some</p> <p>23 kind of way to walk and not fall. So I used the</p> <p>24 wall. So I got the cane in my right hand, and the</p> | <p>1 myself up, hurting, a lot of pressure, pulling</p> <p>2 myself up these four stairs to get to the top of</p> <p>3 the stairs.</p> <p>4 Then I was on my way going out the door,</p> <p>5 which I seen the female sergeant, and I called to</p> <p>6 her. She stopped. I explained to her my condition</p> <p>7 and the handcuffs, and before I could finish, she</p> <p>8 said, it don't matter. It's a rule. And she kept</p> <p>9 on walking.</p> <p>10 Q. Mr. Johnson, just going back to the</p> <p>11 stairs for a moment here. In your complaint you</p> <p>12 wrote that you had to crawl up the stairs.</p> <p>13 A. Yes.</p> <p>14 Q. Did you literally mean on all fours?</p> <p>15 A. I was down -- I wasn't getting down on</p> <p>16 my knees, but I was down where I had to pull myself</p> <p>17 up.</p> <p>18 Q. Okay. Did you pull yourself on the</p> <p>19 stair in front of you?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Was there a railing at all on the</p> <p>22 stairs?</p> <p>23 A. That was the railing.</p> <p>24 Q. Okay. So you were pulling yourself</p> |

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1 along the railing?

2 A. Yes.

3 Q. Where was your cane in your hands when

4 this was happening?

5 A. It was linked onto the cuffs. I put it

6 around the cuffs, and I grabbed ahold to the --

7 because the stairs was short, and I grabbed ahold

8 to the post with the cane, and I pulled myself up.

9 Q. Now when you say you put the cane on the

10 cuffs, did you mean, like, through the loops that

11 were around your wrist or over the --

12 A. No. On the chain. There's a chain on

13 the cuffs. So I hung my cane on the chain and

14 proceeded to struggle to get up the stairs. So I

15 had to use two -- both of my hands getting up the

16 stairs because I grabbed the railing with both

17 hands because I had to because I'm handcuffed. So

18 I'm still pulling --

19 MR. ZEID: I think Mr. Johnson may have cut

20 out while he was answering that question. So we

21 might need to wait a little bit. We can see if he

22 hops back in, but the time is 11:29.

23 MR. PRADOS: I see him as frozen.

24 MR. ZEID: I see him as frozen as well.

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1 Karen, we can go off the record for a

2 moment.

3 (WHEREUPON, a discussion was had off

4 the record.)

5 MR. ZEID: Mr. Johnson, the time is now 11:32.

6 We're back on the record.

7 BY MR. ZEID:

8 Q. And I was just talking to you about

9 getting up the stairs, and you were describing how

10 you had done that. And you had mentioned that you

11 hung your cane on your handcuffs over the chain,

12 and you were using the railing to kind of pull

13 yourself up the stairs.

14 A. Pull myself up. But at the same time,

15 it was still getting pressure because I had to grab

16 both railings -- the railing with both my hands to

17 get up the stairs.

18 MR. PRADOS: I would remind my client to let

19 counsel finish his question before you jump in with

20 an answer. Okay?

21 BY MR. ZEID:

22 Q. Mr. Johnson, was the railing on the

23 right or the left side of you when you were walking

24 up the stairs?

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1 A. It was on the right side.

2 Q. Okay. So you didn't literally crawl on

3 all fours up the stairs?

4 A. No, I never said I crawled.

5 Q. Okay.

6 A. I said I practically.

7 Q. Got it.

8 A. But I didn't crawl literally. I

9 practically. It was just that close to doing that.

10 Q. Got it. You were using the word "crawl"

11 to describe the exertion you had to use to pull

12 yourself up the railing?

13 A. Yes.

14 Q. Okay. Did you ask Officer Bacon for

15 assistance?

16 A. Well, I put my hand out thinking that

17 he's gonna take the handcuffs loose -- you know,

18 take them off while I go up the stairs. But no,

19 you know. He just told me you got to get up the

20 stairs the best way you can. Same smirky smile on

21 his face. Go up the stairs, you know, while he

22 watched me while I'm coming up the stairs, you

23 know, with the same look on his face.

24 Q. Did you actually verbally ask him for

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1 help?

2 A. No, I didn't verbally ask him for help,

3 but I figured going up the stairs, he would loosen

4 the -- take the handcuffs off and let me go up the

5 stairs because those are stairs that I had to climb

6 and the simple fact that I'm already on a cane.

7 But he didn't do that. You know, he just gave me

8 the little remark and walked past me up to the

9 stairs telling me to get up the best way I can.

10 Just, come on.

11 Q. Did anybody help you get up the stairs?

12 A. No one helped me. People walked past.

13 Officers walked past me up and down. One officer

14 came, said, let me get past him before he make me

15 fall. It was just ridiculous. It didn't make any

16 sense to me. It showed me that don't nobody care

17 there that I was struggling, and these were other

18 officers.

19 Q. How many other officers did you see when

20 you were going up the stairs?

21 A. Two. Two walked past me. They walked

22 down, and said, well, let me hurry up and get

23 around him, get past so he won't make me fall.

24 Because it was not wide. It was just small stairs

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| <p style="text-align: right;">Page 56</p> <p>1 going up.</p> <p>2 Q. Do you know the names of either of the</p> <p>3 two officers you --</p> <p>4 A. No. I didn't look at their names</p> <p>5 because they just walked on past me, making that</p> <p>6 remark. You know, they just wanted to get past,</p> <p>7 basically not even asking, well, can I assist you,</p> <p>8 or asking the Officer Bacon, hey, why you won't</p> <p>9 take the handcuffs off him so he can get up the</p> <p>10 stairs? Don't you see he's struggling? Nobody</p> <p>11 said nothing.</p> <p>12 Q. Did you say anything to either of the</p> <p>13 officers?</p> <p>14 A. No, I didn't say anything to this</p> <p>15 officer. I was trying to get up the stairs.</p> <p>16 Q. Okay. So you didn't say anything to</p> <p>17 Bacon or either of these two officers, but then you</p> <p>18 got to the top of the stairs and there was another</p> <p>19 officer, is that correct?</p> <p>20 A. When I walked -- I got outside to</p> <p>21 proceed to the yard, there was a white shirt there,</p> <p>22 a sergeant, and I tried to get her -- getting her</p> <p>23 attention and try and explain it to her, and she</p> <p>24 said she don't care. It's a rule. That's what she</p> | <p style="text-align: right;">Page 58</p> <p>1 to you, is that correct?</p> <p>2 A. Yes.</p> <p>3 Q. What happened after that?</p> <p>4 A. I would proceed to my visit. Officer</p> <p>5 Bacon said, go to your visit.</p> <p>6 Q. Okay. And who was there to visit you</p> <p>7 that day?</p> <p>8 A. My wife and my two granddaughters.</p> <p>9 Q. Now I know you have a lot of</p> <p>10 grandchildren. Which two granddaughters were</p> <p>11 there?</p> <p>12 A. It was Davalia Davis and Jada Johnson.</p> <p>13 Q. Okay. And what did you guys talk about?</p> <p>14 A. Well, I was trying to talk about how</p> <p>15 they were doing and how they were feeling, but, you</p> <p>16 know, my wife, she was concerned about the cuffs,</p> <p>17 how I was cuffed, how my hand was swollen and</p> <p>18 turned red, you know. And she was just saying was</p> <p>19 that necessary and all that, you know. And I was</p> <p>20 just trying to just change the subject, and</p> <p>21 let's -- tell me how you guys are doing. What's</p> <p>22 going on? You know, and we exchanged a little</p> <p>23 conversation, but she was really upset. So we</p> <p>24 couldn't -- me and her wasn't really communicating</p> |
| <p style="text-align: right;">Page 57</p> <p>1 said, it's a rule, and she kept going. She didn't</p> <p>2 explain. She just said the two words, it's a rule,</p> <p>3 and she kept going.</p> <p>4 Q. Do you know how tall the stairs were?</p> <p>5 A. They were -- they wasn't tall stairs.</p> <p>6 They was kind of medium stairs.</p> <p>7 Q. Do you know how many steps?</p> <p>8 A. The steps -- there was three stairs, and</p> <p>9 then the top stair.</p> <p>10 Q. Could you repeat that?</p> <p>11 A. There were three stairs -- there was</p> <p>12 three stairs, then the fourth stair, that's the</p> <p>13 landing, the top stair.</p> <p>14 Q. Okay. So I'm not going to ask you to</p> <p>15 estimate, but the three stairs and then the fourth</p> <p>16 stair, that's kind of where the incident happened,</p> <p>17 right?</p> <p>18 A. Where what happened?</p> <p>19 Q. This exchange on the stairs where you</p> <p>20 had to use the railing, that's the stairs and</p> <p>21 the -- the four stairs?</p> <p>22 A. Yes.</p> <p>23 Q. After you got to the top of the stairs,</p> <p>24 you talked to the white shirt, and she spoke back</p> | <p style="text-align: right;">Page 59</p> <p>1 or talking about anything else because she was mad</p> <p>2 about the situation with my hand, my wrist, and</p> <p>3 everything. And she just was upset about it.</p> <p>4 That's all. You know, and I was just trying to get</p> <p>5 through the visit.</p> <p>6 Q. So you didn't even want to talk about</p> <p>7 the cuff situation, but your wife was really upset</p> <p>8 by what she could see?</p> <p>9 A. Exactly.</p> <p>10 Q. Did you tell her anything about the</p> <p>11 cuffs, or did she just observe, you know, that you</p> <p>12 were in pain?</p> <p>13 A. That I was in pain. And I just told her</p> <p>14 that I had to walk in cuffs to the visit, and she</p> <p>15 just replied, why? You was never cuffed before.</p> <p>16 Which is true, I haven't. And this was the first</p> <p>17 time. And that's what got me. And that's what she</p> <p>18 was upset about.</p> <p>19 Q. Were you handcuffed the entire time</p> <p>20 during this visit?</p> <p>21 A. The entire time.</p> <p>22 Q. What happened after the visit? You</p> <p>23 know, did you tell the officers you were done? Did</p> <p>24 they come over and pick you up, or what happened?</p> |

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| <p style="text-align: right;">Page 60</p> <p>1 A. No, they told me that the visit was 2 over. They escorted my family out, and I had to 3 sit and wait until the officer that escorted come 4 and pick me up. So they had left. They escorted 5 them out, but I still had to stay there at the 6 table until Officer Bacon came and picked me up. 7 Q. How long do you think that was? 8 A. I'd say maybe about a good five to 9 seven minutes. 10 Q. And did he say anything to the officers 11 at this time about the handcuffs? 12 A. No. Who did? Did he? 13 Q. Yes. 14 A. I already told him about the handcuffs, 15 and he already let me know that he wasn't gonna do 16 anything to the handcuffs because there wasn't 17 nothing wrong with them. So when I seen him, he 18 came out the tier, he waved for me to come, and I 19 walked over there to him to proceed to go back 20 down. 21 Q. And did you have a mask on during your 22 visit? 23 A. Yes, I did. 24 Q. Okay. And did you have a mask on after</p> | <p style="text-align: right;">Page 62</p> <p>1 quick second so I can try and see -- 2 MR. ZEID: Absolutely. Thanks, Adrian. 3 (WHEREUPON, a discussion was had off 4 the record.) 5 BY MR. ZEID: 6 Q. Mr. Johnson, we're back on the record. 7 You were just talking about what 8 happened after your visit, and you were describing 9 the elevator. I just want to back up. 10 So you finished your visit. You're 11 waiting for Officer Bacon to come. Officer Bacon, 12 comes, and where do you walk prior to getting in 13 the elevator doors? 14 A. We have to walk the long tier back again 15 to the medical unit, which is Division 8. You 16 know, so I had to go back through the same thing 17 with him, walking and I'm sweating. But then, like 18 I said, the mask had got real wet, and I pulled it 19 down, and I asked Officer Bacon can I get another 20 mask because I can't breathe barely out of this 21 mask because I'm an asthmatic. And he said, no, 22 just put the mask on and just come on. Let's go. 23 And doing the same thing. Taking a few steps, 24 turning around, kept looking at me, smiling with</p> |
| <p style="text-align: right;">Page 61</p> <p>1 that visit as well? 2 A. After the visit? What you saying? 3 Going back to my tier? 4 Q. Yes. On your way back. 5 A. On my way back, yes. Everybody had to 6 be masked once you leave your tier. You have to be 7 masked until you get back to your tier. Then you 8 can take your mask off. But going anywhere else in 9 the facility, you had to be masked up. 10 Q. Now after your visit, there's an 11 elevator that comes into question. 12 What happens before you get to the 13 elevator? 14 A. On my way back? 15 Q. Yeah. What does it look like? 16 A. Well, I mean, it doesn't look like 17 anything. I'm upset. He doesn't care. You know, 18 he just said, I'm glad it's over, you know. You 19 almost there. We got in the elevator, we rode the 20 elevator to the third floor, got off. He escorted 21 me -- 22 MR. ZEID: I think Mr. Johnson may have cut 23 out again or something. 24 MR. PRADOS: Can we go off the record for a</p> | <p style="text-align: right;">Page 63</p> <p>1 the same old smirk on his face. You know, I mean, 2 that's the smile that really bothered me. And we 3 went through it all the way. 4 We get to the elevators, and we go in 5 the elevator. He said, I'm glad this is over. 6 Walked me to my tier, and I'm holding my hands up 7 for him to take the cuffs off. Still rude. Just 8 the same old smirk smile on his face, you know, 9 like he did something. I guess he did. You know, 10 he abused his authority. He unhandcuffed me, and 11 then just walked away and didn't say nothing else 12 before he walked away. 13 The tier officer came out and got me. 14 Like I said, I went straight -- pulled my mask 15 down, gave myself two pumps because I was having a 16 small attack at the time then, and I walked to the 17 bathroom and proceed to hold my hand under the cold 18 water. You know, after that, it kind of stopped 19 stinging a little bit, you know. I know it's 20 swollen real bad. 21 So I went out there, and I went to the 22 officer, Officer Orr, and I expressed to him, and 23 he told me, you look like something is wrong. I 24 can see it. And I asked him could I get the</p> |

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| <p style="text-align: right;">Page 64</p> <p>1 supervisor. He called the supervisor, and the 2 supervisor came. I showed him my wrist and 3 everything, my hand, you know. And she said oh, my 4 God. I said this is the reason of one of your 5 officers. And she asked me what was his name, and 6 I told her, Officer Bacon. And she told me, don't 7 worry about it. She's gonna find him, locate him, 8 and make sure he's disciplined. You know, she had 9 the nurse to give me two Tylenol because the nurse 10 came then. And I went back to my tier, and I laid 11 down. I was very upset and disappointed of the 12 whole situation.</p> <p>13 Q. Now I want to kind of back you up a 14 little bit, Mr. Johnson, to where Officer Bacon is 15 escorting you and you've got this mask on, and 16 you're taking it off to tell him that, you know, 17 you're having a hard time breathing.</p> <p>18 Did he instruct you to put your mask 19 back on?</p> <p>20 A. Yes, he told me to put my mask back on. 21 He said, just put your mask back on and come on.</p> <p>22 Q. And were you complying with that order?</p> <p>23 A. And I complied with it. And I told him 24 it's hard to breathe, that I'm an asthmatic.</p> | <p style="text-align: right;">Page 66</p> <p>1 Q. And when you got into the elevator, you 2 were holding your cane in your right hand still?</p> <p>3 A. Yes. I came in the elevator. I went to 4 the front, and I was up against the wall with the 5 cane in my hand. We rolled up to the third floor, 6 and we got off, and I'm struggling to get off the 7 elevator, and that was a good thing then my tier 8 was -- when we get off the elevator, and you make a 9 left, and my tier is right there.</p> <p>10 So I struggled and slowly walked up to 11 the tier. Once I got there, I held my hand up 12 waiting on him to take the cuffs off, and, again, 13 he just looked at me first with the little smirk on 14 his face, then he unhandcuffed me and he walks 15 away.</p> <p>16 Q. Did you have an asthma attack while you 17 were handcuffed?</p> <p>18 A. Yes. By the time we had got to my tier, 19 I started having an asthma attack because I 20 couldn't breathe out of the mask barely. The mask 21 was soaking wet.</p> <p>22 Q. Did you tell Officer Bacon you were 23 having an asthma attack?</p> <p>24 A. I told him that I have asthma, that I</p> |
| <p style="text-align: right;">Page 65</p> <p>1 Q. Did he say anything --</p> <p>2 A. He didn't say anything except just the 3 "come on" with the smile on his face, you know, 4 like almost a joke. Or maybe he caught a wild 5 animal or something.</p> <p>6 Q. And this is the point where you told him 7 you were asthmatic?</p> <p>8 A. Yes.</p> <p>9 Q. And this is where you got to the 10 elevator with him?</p> <p>11 A. This is before I got into the elevator 12 with him. This is while I was walking, and I 13 pulled my mask down, and I asked him, can I get 14 another mask.</p> <p>15 Q. Was this the first time in this exchange 16 when you got out of your cell to visitation to now 17 that you had trouble breathing with your mask on?</p> <p>18 A. No, I never had trouble breathing with 19 the mask on.</p> <p>20 Q. Until now?</p> <p>21 A. Until now.</p> <p>22 Q. So then you got in the elevator. Was it 23 just you and Officer Bacon?</p> <p>24 A. Yes.</p> | <p style="text-align: right;">Page 67</p> <p>1 need to take it off. I'm gonna have an asthma 2 attack. By the time I got to the tier, I was 3 having an asthma attack.</p> <p>4 Q. Did you tell --</p> <p>5 A. And he knew it. He knew. He seen my 6 look in my face. He seen the sweat pouring down my 7 face, dripping in my mask wet. He seen all of 8 this, and still he stood there looking at me with 9 that smirk on his face, just laughing at me like he 10 really did something that was really on purpose 11 when it wasn't. And he unhandcuffs me, and he 12 walks away.</p> <p>13 Q. Did you tell him, I'm having an asthma 14 attack, or was it just obvious based on how you 15 looked?</p> <p>16 A. It was just obvious based on how I 17 looked. I'm breathing, gasping for air, sweat 18 dripping down my face. So he knew something was 19 wrong with me because I had already told him on the 20 way that I can barely breathe. I need another mask 21 or I'll have an asthma attack.</p> <p>22 Q. Did you ask Officer Bacon if you could 23 use your inhaler?</p> <p>24 A. Huh? No, I didn't ask Officer Bacon</p> |

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| <p style="text-align: right;">Page 68</p> <p>1 could I use my inhaler because right there when I 2 told him could I get another mask, I wasn't having 3 an asthma attack then. As I put it on and as we 4 got almost to the tier, I was having an asthma 5 attack then, going to the elevator. 6 Q. And at this point, you were still 7 handcuffed and Officer Bacon was there? 8 A. Smirking, looking at me on the elevator, 9 smiling. And at that point, he knew something was 10 wrong with me because my breathing method had 11 changed. But that didn't matter to him. 12 Q. But you didn't actually say, I'm having 13 an asthma attack, or ask to -- 14 A. I didn't tell him that I was actually 15 having an asthma attack, but he knew what was the 16 outcome of him not giving me a mask and the mask 17 that I had was soaking wet. He knew the outcome of 18 it because I told him clearly that I'm gonna have 19 an asthma attack. I need another mask. You know, 20 I can barely breathe out of that. And we walking 21 that same -- that long distance in 90-degree 22 weather, so sweat was running off my face. The 23 mask was wet. My breathing method had changed 24 because now I'm having an asthma attack.</p> | <p style="text-align: right;">Page 70</p> <p>1 condition. 2 Q. So you're having this asthma attack. 3 You're almost to your tier, and Officer Bacon 4 removes your handcuffs at this point? 5 A. Once I got to my tier, yes. I raised 6 them up for him to take them off, but I guess a few 7 seconds he's still giving me that look with the 8 smirk smile on his face for, I guess, maybe a 9 second or two. Then he took the handcuffs off. 10 Q. And during this interaction, you are 11 suffering from an asthma attack? 12 A. I'm suffering from an asthma attack. He 13 seen sweat just pouring down my face as well as off 14 the mask. 15 Q. And -- 16 A. He didn't care. 17 Q. Did he let you use your inhaler once he 18 took your handcuffs off? 19 A. Once he took my handcuffs off, I grabbed 20 it myself and took it out of my back pocket, and I 21 squirted it because I needed it. I wasn't going to 22 ask him for permission. I figured I didn't have to 23 do that, especially the way he had treated me. He 24 showed me that he didn't care right there.</p> |
| <p style="text-align: right;">Page 69</p> <p>1 Q. Now where on your body do you keep your 2 inhaler? 3 A. Huh? 4 MR. PRADOS: I couldn't hear your question. 5 MR. ZEID: I was just asking Mr. Johnson where 6 on his body he kept his inhaler on July 19th. 7 BY THE WITNESS: 8 A. I had it in my back pocket. 9 BY MR. ZEID: 10 Q. Have you heard of inmates at Cook County 11 Jail taking inhalers apart? 12 A. Say that again. 13 Q. I said have you heard of inmates at Cook 14 County Jail taking inhalers apart? 15 A. Yes, I've seen that happen. I've seen a 16 whole lot of things happen in the Cook County Jail, 17 and that was mainly one of them. You know, as well 18 as a lot of authority abuse going on in the 19 facility. 20 Q. Have you seen inmates use inhaler parts 21 as weapons before? 22 A. Not -- yeah, I've seen it. I've seen it 23 taken apart. But I never needed to because I 24 didn't have no reason to. I needed mine for my</p> | <p style="text-align: right;">Page 71</p> <p>1 Q. How did your wrists feel after the 2 handcuffs came off? 3 A. They was throbbing, aching with pain, 4 and they were swollen. Because I took the pump, 5 the inhaler, and I'm looking at my hands. And then 6 I just went straight to the washroom and started 7 holding them under the cold water because I was 8 getting this burning feeling of pain all through my 9 wrists, all up my fingers and my hand, and the 10 tingling and the numbness right today. As the 11 surgeon said at Stroger, you might not get all the 12 feeling back in the back of your hand, which he's 13 right because I don't. 14 Q. Were you recuffed at all? 15 A. No. 16 Q. Okay. So why did you feel the handcuffs 17 were excessively tight? 18 A. Because of the pressure I was feeling on 19 my arm, up against the bone of my wrist, around the 20 edge of my hand -- on both hands. And then on top 21 of that, I had to walk with my cane with both hands 22 on top of each other. The left hand on top of it 23 putting pressure on my hand with the other cuff 24 while I'm trying to walk with the cane.</p> |

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| <p style="text-align: right;">Page 72</p> <p>1 Q. All right. Well, I appreciate you 2 answering those questions for me. I'm going to 3 kind of shift directions now. I'm going to ask you 4 a little bit about the grievance process. Okay, 5 Mr. Johnson? 6 A. Okay. 7 Q. Do you know what an inmate handbook is? 8 A. Yes. I've seen -- you get one. I 9 didn't get one, but I seen one. 10 Q. What is an inmate handbook? 11 A. It's a handbook that has all the rules 12 in it. 13 Q. And did you get the handbook ever? 14 A. I didn't never get the handbook. I went 15 in there -- every time I got my bunk, my roll -- as 16 you call it, my roll with the blanket and the 17 sheets. I never got a handbook. But I was given a 18 handbook and I read -- I kept it and I read it. 19 Q. So you got a handbook from another 20 inmate? 21 A. Yes. 22 Q. Okay. But not from Cook County? That's 23 what you were saying? 24 A. Not from Cook County, yes.</p> | <p style="text-align: right;">Page 74</p> <p>1 forms, did anyone try to withhold those from you? 2 A. No. There was requests for them in the 3 slot constantly. 4 Q. Did anyone ever try to stop you from 5 filing a grievance or a health service request 6 form? 7 A. No. 8 Q. Did anybody ever threaten you to prevent 9 you from filing a health grievance request form? 10 A. No. 11 Q. Okay. Did you file a grievance form 12 regarding the incident on July 19th, 2020? 13 A. Yes, I did. 14 Q. And did you receive a response to that 15 grievance? 16 A. Yes, I did. 17 Q. Do you remember if you appealed it? 18 A. Yes, I did appeal it. 19 MR. ZEID: Okay. I'm going to show you what 20 will be marked as Exhibit 2. It's Grievance 21 2020 08918, and it's the July 19, 2020 grievance. 22 (WHEREUPON, a certain document was 23 marked Defense Exhibit No. 2, for 24 identification, as of 2-6-24.)</p> |
| <p style="text-align: right;">Page 73</p> <p>1 Q. Okay. Do you know what a grievance form 2 at Cook County Jail is? 3 A. It's for if you -- it's for any 4 incidents that happen to you, or you not being 5 treated right by some officer or anybody within the 6 tier, that you can file a grievance. 7 Q. Do you understand the grievance process 8 at Cook County Jail? 9 A. Yes. You fill it out. You give it to 10 the social worker, and you wait until a response. 11 Once you get the response and you read the 12 response, you can accept it or you can appeal it 13 and write down the reason why you disagreeing with 14 their answer. 15 Q. Has anyone ever withheld grievance forms 16 from you? 17 A. Withheld them? I wouldn't say withheld. 18 It's been a time when some things went down and -- 19 request for the grievances, and they said there 20 wasn't any grievances. Or we not able to give you 21 any grievances at this time, you know, which I was 22 told a grievance supposed to be on hand at all 23 times. 24 Q. What about with health service request</p> | <p style="text-align: right;">Page 75</p> <p>1 BY MR. ZEID: 2 Q. Let me know if you can see my screen 3 here in a second, okay, Mr. Johnson? 4 You should be seeing Exhibit 2. 5 A. Okay. I'm seeing. It's here. 6 Q. Can you read the control number on the 7 top here? I have my mouse by it. 8 A. 2020 00918. I think that's it. I need 9 glasses. 10 Q. If I were to tell you that instead of a 11 second 0, it was an 8 on the control number, would 12 you take my word for it? 13 A. Yes, I would take your word for it 14 because I'm looking at it. I can see it a little 15 bit because I need glasses anyway, you know. But I 16 can see now that this is looking like an 8 instead 17 of another 0 because I'm trying to adjust my eyes. 18 Q. Well, if you need me to zoom in or zoom 19 out at any point, just let me know, okay? 20 A. Okay. I don't need to zoom out right 21 now. 22 Q. I'm just going to scroll through the 23 whole document just so you can see the whole 24 exhibit real quickly, and then I'll ask you some</p> |

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| <p style="text-align: right;">Page 76</p> <p>1 more questions about it. Okay?</p> <p>2 A. Okay.</p> <p>3 Q. I'm going to scroll to the end of</p> <p>4 Page 1.</p> <p>5 A. Okay. That's what I wrote.</p> <p>6 Q. This will be Page 2.</p> <p>7 A. Uh-huh.</p> <p>8 Q. And then Page 3.</p> <p>9 A. Okay. That I wrote was my response to</p> <p>10 what they -- the answer that they gave me.</p> <p>11 Q. Okay. So you recognize this form then?</p> <p>12 A. Yes, I do.</p> <p>13 Q. Okay. And this was your handwriting?</p> <p>14 A. Yes, it is.</p> <p>15 Q. Okay. Mr. Johnson, do you mind reading</p> <p>16 into the record what is written here in the</p> <p>17 narrative section of your grievance?</p> <p>18 A. On what section?</p> <p>19 Q. This section right here, the narrative</p> <p>20 section.</p> <p>21 A. I see you moving something around.</p> <p>22 Q. I'll start with where it begins.</p> <p>23 A. Okay. Where the date -- where it</p> <p>24 happened? Because I can't see it. The date where</p> | <p style="text-align: right;">Page 78</p> <p>1 Q. That's okay.</p> <p>2 A. Well, basically, what I was saying here</p> <p>3 about the mask, that it was so wet, you know, that</p> <p>4 I couldn't breathe.</p> <p>5 Q. I can try to -- Mr. Johnson, I can try</p> <p>6 to read it, and you can tell me if it's accurate at</p> <p>7 the end.</p> <p>8 A. Okay. There at the bottom.</p> <p>9 Q. I'll just start with, "He stop, looked,</p> <p>10 and turned around and keep walking. I was sweating</p> <p>11 so bad the mask was wet. I ask can I pull it down</p> <p>12 or get another one. He said no. I was short of</p> <p>13 breath."</p> <p>14 Does that sound right?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And did you review this grievance</p> <p>17 before submitting it?</p> <p>18 A. Yes, I did.</p> <p>19 Q. Okay. Is that your signature down there</p> <p>20 under Inmate's Signature?</p> <p>21 A. Yes, it is.</p> <p>22 Q. I'm just going to scroll to the next</p> <p>23 page which has the response here, and I'm just</p> <p>24 going to read it into the record, okay?</p> |
| <p style="text-align: right;">Page 77</p> <p>1 you were to put down what happened, the date of the</p> <p>2 incident, and you have to write down the tier and,</p> <p>3 I think, the reason -- I mean, the location and the</p> <p>4 officer's name.</p> <p>5 Q. Okay. And would you mind reading what</p> <p>6 you said happened in this grievance?</p> <p>7 A. Okay. "On Sunday visiting day, I was</p> <p>8 call for my visit. I went out the door. Waiting</p> <p>9 was Officer Bacon. He see that I was on a cane. I</p> <p>10 told him, I don't get handcuffed because I'm on the</p> <p>11 cane -- because of the cane. He said that I would</p> <p>12 be cuffed anyway -- I would be cuffed up -- I would</p> <p>13 be cuffed up today. I had a hard time walking, and</p> <p>14 the officer -- and the cuffs was digging down in my</p> <p>15 right hand, and I was suffering there and" -- let's</p> <p>16 see. "And on the way back, I told him that -- on</p> <p>17 the way back, I told him that I had suffered --</p> <p>18 that the cuffs hurting and I was in a lot of pain.</p> <p>19 He stopped, looked, and turned around and kept</p> <p>20 walking. I was sweating so bad the mask was wet.</p> <p>21 I ask him" -- I can't see that. My eyes are</p> <p>22 getting blurry now. "I ask can I pull it down or</p> <p>23 get another mask -- another mask." Wow, I'm having</p> <p>24 a hard time reading this now.</p> | <p style="text-align: right;">Page 79</p> <p>1 A. Okay.</p> <p>2 Q. "Staff has been following safety and</p> <p>3 security procedures."</p> <p>4 Is that what it says there?</p> <p>5 A. Yes. That's the response I got.</p> <p>6 Q. Okay. And did you appeal this</p> <p>7 grievance?</p> <p>8 A. Yes, I did.</p> <p>9 Q. Okay. Did you file that appeal on</p> <p>10 August 8th, 2020?</p> <p>11 A. Yes.</p> <p>12 Q. Why did you appeal this grievance?</p> <p>13 A. Because I felt that the response wasn't</p> <p>14 fair. I mean, it didn't even explain anything. It</p> <p>15 just stated that the cuffs is for safety. That's</p> <p>16 all it said. The cuffs is for safety. But it</p> <p>17 didn't go in detail to find out, you know, my</p> <p>18 condition and the point that how did you consider</p> <p>19 me a threat? I wasn't a threat. I was barely</p> <p>20 getting around with the cane. So how could you</p> <p>21 just say cuffs is for safety? I mean, the</p> <p>22 response -- I mean, it didn't even make any sense</p> <p>23 to me towards me explaining what happened to me and</p> <p>24 my condition because, I mean, everything is on file</p> |

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| <p style="text-align: right;">Page 80</p> <p>1 there. That's one thing about them. Everything is 2 noted. 3 So I wrote that grievance, and that's 4 the only response I can get meaning that you wasn't 5 really concerned of my condition and how I was 6 treated as I was going to my visit. 7 Q. Now, Mr. Johnson, under Inmate's Request 8 for an Appeal, I'm just going to read to you what 9 you wrote, and you can tell me if that's your 10 appeal or not. Okay? 11 A. Okay. 12 Q. Okay. You said, "I never been 13 handcuffed since I've been on this cane until 14 Officer Bacon. I could barely walk on the cane. I 15 sure was not a threat for safety. This was a 16 controlling all it" -- I think that's the word 17 that's written there. 18 A. Huh? 19 Q. "My injury to my hand and wrist is 20 proof. Officer Orr and something Prunell and 21 Superintendent Contic," I believe. 22 A. It was Hayes. I was writing that 23 Sergeant Parcell and Superintendent Hayes witnessed 24 my injury, you know.</p> | <p style="text-align: right;">Page 82</p> <p>1 Now earlier in the deposition, 2 Mr. Johnson, you had described your handcuffs. 3 They were out in front of you. 4 Were you shackled at all with your 5 ankles or anything? 6 A. No, I wasn't. 7 Q. Okay. So it was just restraints on your 8 wrists? That was it? 9 A. Yes. 10 Q. Okay. I'm going to ask you some 11 questions about your injury. 12 Mr. Johnson, do you have any reason to 13 dispute the accuracy of your medical records? 14 A. What do you mean? 15 Q. Do you have any reason to think your 16 medical records aren't accurate? 17 A. No, I don't have any reason to think 18 that they aren't accurate. 19 Q. Okay. And what injury are you claiming 20 occurred as a result of the incident on July 19th? 21 A. The injury to my wrist and my hand and 22 my left hand because now my left hand is starting 23 to bother me and my fingers are locking, you know. 24 So it seems like it's escalating to the other hand</p> |
| <p style="text-align: right;">Page 81</p> <p>1 Q. And was this appeal accepted? 2 A. It was accepted, but I never got a 3 response back after that. 4 Q. Do you see where it says, 5 "Administrator/Designee's Acceptance of Inmate's 6 Appeal"? 7 A. You say at the bottom? 8 Q. Do you see where my mouse is? 9 A. Yeah, I see where your mouse is. 10 Q. You see it says, 11 "Administrator/Designee's Acceptance of Inmate's 12 Appeal" here? 13 A. Yes. 14 Q. And right beside that, there's a box for 15 yes and a box for no, and the one for no has a 16 check next to it, right? 17 A. Yes. 18 Q. In response to your appeal, Inmate 19 Services Director wrote, "All detainees are 20 restrained during movement. Original response 21 stands." Is that correct? 22 A. Yes. 23 Q. I'm going to stop sharing this exhibit 24 now.</p> | <p style="text-align: right;">Page 83</p> <p>1 now, and I'm seeing a specialist for that. 2 Q. So do you still suffer from those 3 injuries today? 4 A. Yes, I am. I'm still having pain. The 5 swelling is still on my wrist, and I just -- I just 6 went to therapy. So I'm just waiting until my next 7 doctor's appointment for them to run some tests 8 because they have their own surgeon. 9 Q. Okay. 10 A. And, of course, my left -- sorry. I 11 didn't mean to interrupt. 12 Q. No, you're fine, Mr. Johnson. I was 13 just going to ask, so you said your left hand 14 started hurting recently? 15 A. Yes, it started hurting recently. Two 16 months ago, I got an injection to my hand but it 17 wasn't -- it was in, I think, June -- it was in 18 April of last year. And I had to stop going to 19 therapy because I had -- I was scheduled for my 20 back -- back surgery. You know, so I'm dealing 21 with a double -- triple thing now. Due to neglect 22 that I was getting there, it damaged my L4 disc in 23 my back. It was bone to bone, and I was constantly 24 falling, and I had to have a transplant -- a double</p> |

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| <p style="text-align: right;">Page 84</p> <p>1 disc transplant. So I wasn't able to go to therapy 2 then because I was laid up with 32 staples in my 3 back. Again, after I got out and started taking 4 therapy, I proceeded to go back to see my doctor 5 because my hands was -- is still worse. I can't 6 pick nothing up up to five pounds without getting 7 tremendous pain, and I'm just having trouble 8 walking around. And now I'm having trouble with my 9 cane to the point that when I go out, I have to use 10 a walker.</p> <p>11 Q. Now this injection in your wrist that 12 you mentioned about a year ago that you got, was 13 that in your right hand or your left hand?</p> <p>14 A. That was in my left hand because then my 15 left hand was starting to bother me, which is now 16 starting to rebother me. It's swollen. I'm 17 getting --</p> <p>18 MR. PRADOS: Can we take -- maybe we can take 19 advantage of this -- can we go off the record for a 20 quick moment?</p> <p>21 MR. ZEID: We can go off the record.</p> <p>22 MR. PRADOS: He's back.</p> <p>23 BY MR. ZEID:</p> <p>24 Q. Mr. Johnson, sorry. We kind of lost you</p> | <p style="text-align: right;">Page 86</p> <p>1 come in with that brace, you know. And so I just 2 said, well, I didn't need it. I had a little 3 sensation problem, but it's gone. So I wasn't 4 treated there at all for my hand or my wrist while 5 I was incarcerated. It was fine.</p> <p>6 Q. So prior to the incident in question, 7 prior to even going to jail, you had some issues 8 with your right wrist. You had gotten an 9 injection. And then around the time when you were 10 going to jail, you were recovering from that 11 injection. You had a splint on your wrist --</p> <p>12 A. Yes.</p> <p>13 Q. -- and when you got to jail, they told 14 you you can't have that splint anymore, and it was 15 just never treated after that?</p> <p>16 A. It was just -- I didn't -- my hand 17 wasn't bothering me anymore. So I didn't push the 18 issue when she took the sling. I didn't push the 19 issue. Everything was fine. I was going about my 20 day. I wasn't having any pain. I was lifting. I 21 was able to squeeze and pick things up. So it 22 didn't matter. You know, so I wasn't treated at 23 all at that time. You know, I was more concerned 24 about my back, you know.</p> |
| <p style="text-align: right;">Page 85</p> <p>1 there.</p> <p>2 MR. PRADOS: Can we take a 20-minute break at 3 12:30?</p> <p>4 MR. ZEID: Twenty is a lot, but if you need 5 it, absolutely. Of course, I'd prefer to just keep 6 things rolling.</p> <p>7 MR. PRADOS: Let's do a ten-minute break then 8 at 12:30.</p> <p>9 MR. ZEID: We'll keep going until 12:30 then.</p> <p>10 BY MR. ZEID:</p> <p>11 Q. Mr. Johnson, you were just describing 12 the injury a little bit to me, and you were talking 13 about how you had this injection in your left hand 14 a year ago, and it was rebothering you now.</p> <p>15 Had your wrists bothered you at all 16 prior to July 19th, 2020?</p> <p>17 A. Yes, somewhat. I had an injection to my 18 right hand because it was bothering me. They said 19 that was a slight carpal tunnel problem, and I got 20 an injection. And I got a brace, you know. But I 21 didn't -- it didn't bother me. It wasn't bothering 22 me. It had stopped bothering me. But when I got 23 locked up, I had the brace on my hand, and the 24 doctor when I got there told me that I couldn't</p> | <p style="text-align: right;">Page 87</p> <p>1 Q. Mr. Johnson, you previously mentioned 2 that you got diagnosed with carpal tunnel following 3 your time in jail. That was diagnosed by a medical 4 professional?</p> <p>5 A. No, not while I was in the County.</p> <p>6 Q. No, after the jail.</p> <p>7 A. Yes, after the jail. Not inside because 8 I was okay. My hand wasn't bothering me at all, 9 you know. The splint was taken away when I got 10 in, and I left it alone because I didn't have no 11 reason to because my hand wasn't bothering me.</p> <p>12 Q. Did the medical professional that 13 diagnosed you with carpal tunnel after you spent 14 time in jail say that those injuries were a result 15 of this incident?</p> <p>16 A. They said yes.</p> <p>17 Q. They did? They told you that because 18 your handcuffs were on too tight, it caused carpal 19 tunnel?</p> <p>20 A. It caused pressure to reaggravated it. 21 I guess it reaggravated the injury that I had. You 22 know, it just made it worse. The handcuffs brought 23 it back, made it worse, caused a lot of swelling 24 and pain.</p> |

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| <p style="text-align: right;">Page 88</p> <p>1 Q. Did they say -- 2 A. Where I had to have surgery. 3 Q. I didn't mean to interrupt you there. I 4 was just going to say so it sounds like the doctors 5 said that the handcuffing incident reaggravated 6 this already existing injury, is that correct? 7 A. Yes. 8 Q. So you already had issues with your 9 wrist before jail? 10 A. Yeah, before jail, and it passed. 11 Q. Okay. Did you see a medical 12 professional the day of the incident? 13 A. Of the incident, no, I didn't see a 14 medical professional. I had to wait and put in a 15 slip. 16 Q. I'm sorry. So you did put in a health 17 service slip? 18 A. Yes. 19 Q. And I think earlier you said you saw a 20 nurse that day? 21 A. I saw the nurse that day. She gave me 22 some Tylenol. 23 Q. And then you put in a health service 24 slip to get further treatment?</p> | <p style="text-align: right;">Page 90</p> <p>1 see the doctor, I showed them what's going on. He 2 witnessed the pain and the swelling that was going 3 on. 4 Q. How did you fill out this Health Service 5 Request form? 6 A. I mean, well, you put in your name, your 7 ID number, and you request to see the doctor, and 8 you describe what's going on. 9 Q. Where did you submit it? 10 A. You submit it into the box. 11 Q. Okay. 12 A. The box, the medical box. 13 THE COURT REPORTER: I'm sorry. You're 14 talking over each other, and then I can't hear any 15 of you. 16 BY MR. ZEID: 17 Q. Mr. Johnson, would you just answer? 18 A. Yes. 19 MR. ZEID: All right. I am going to introduce 20 what will be the medical records, and it's 21 Bates-stamped DP Johnson 2481. I'll pull these up. 22 (WHEREUPON, a certain document was 23 marked Defense Exhibit No. 3, for 24 identification, as of 2-6-24.)</p> |
| <p style="text-align: right;">Page 89</p> <p>1 A. Exactly. 2 Q. Do you remember the name of the nurse 3 you spoke with that day? 4 A. I don't remember her name. 5 Q. Do you know what she looked like at all? 6 A. She was tall, white, with glasses. She 7 was real nice. 8 Q. But that treatment that you got, that 9 just occurred on the tier, and then you put in a 10 Health Service Request form and that was it? 11 A. That was it. 12 Q. Okay. What about after you put in a 13 Health Service Request form? Did a doctor speak to 14 you? 15 A. No. Couldn't nobody speak with you, no 16 doctor. I told the nurse about it, and showed the 17 nurse, and she said, well, did you put in a medical 18 slip? I said, yes, I did. And she said, okay. 19 You have to wait until you be called by the doctor. 20 Q. So you never heard back about your 21 medical slip? 22 A. I heard back from it, I'd say, maybe a 23 week, two weeks later. Something like that. They 24 called me to see the doctor. Then once I went to</p> | <p style="text-align: right;">Page 91</p> <p>1 BY MR. ZEID: 2 Q. Just let me know if you can see the 3 screen, okay, Mr. Johnson? 4 A. Okay. Yes, I see the screen. 5 Q. I'm just going to scroll through the 6 whole document first. It's about nine pages. And 7 then I'll ask you questions about it. I just want 8 to make sure you review the whole thing. 9 A. That's the document from the medical 10 physician, right? 11 Q. Exactly. 12 A. Okay. 13 MR. ZEID: And I'll ask you questions about 14 it, but I think now is probably a good time to take 15 that break Adrian mentioned just because I don't 16 want to get into it before we're about to leave. 17 So ten minutes, does that sound good to 18 everybody? 19 MR. PRADOS: Thank you so much. And if you 20 could mute everybody. 21 MR. ZEID: I actually am unable to mute 22 anyone. But Mr. Johnson and I talked about how to 23 do it, so he should be able to do it. 24 We'll be back at 12:40.</p> |

25 (Pages 88 to 91)

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| <p style="text-align: right;">Page 92</p> <p>1 (WHEREUPON, a recess was had.)</p> <p>2 MR. ZEID: It is 12:41. We'll go back on the</p> <p>3 record.</p> <p>4 BY MR. ZEID:</p> <p>5 Q. Mr. Johnson, if you remember, I was just</p> <p>6 showing you Exhibit 3, which are medical records,</p> <p>7 DP Johnson 2473 through 2481, and I'll just go</p> <p>8 ahead and pull those up.</p> <p>9 A. Okay.</p> <p>10 Q. Let me know if you can see what is on</p> <p>11 the screen.</p> <p>12 A. Okay. Yeah, I can see now.</p> <p>13 Q. Okay. Perfect. We had just finished</p> <p>14 kind of reviewing the whole document, and I'm just</p> <p>15 going to start at the top.</p> <p>16 So you see how it says, "Health Service</p> <p>17 Request" here at the top of the page?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And this is on Page 1 of the</p> <p>20 exhibit, and I'm just going to scroll to the last</p> <p>21 page now.</p> <p>22 Can you see how it says, "Outpatient</p> <p>23 Dental Care"?</p> <p>24 A. Yes.</p> | <p style="text-align: right;">Page 94</p> <p>1 Q. Okay.</p> <p>2 A. Yes.</p> <p>3 Q. So this exhibit starts with the Health</p> <p>4 Service Request form you filed on June 4th, and</p> <p>5 goes all the way to the end of your Health Service</p> <p>6 Request files on the subject of Outpatient Dental</p> <p>7 CHS.</p> <p>8 You saw that on the screen earlier,</p> <p>9 right?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. I'm going to scroll through this</p> <p>12 document under each Health Service Request form,</p> <p>13 and let me know if you see one dated July 19th,</p> <p>14 2020, okay, Mr. Johnson?</p> <p>15 This one is June 4th. It looks like the</p> <p>16 next one here is June 9th, is that correct?</p> <p>17 A. Yes, June 9th.</p> <p>18 Q. Okay. I'm going to keep scrolling until</p> <p>19 we get to the next one.</p> <p>20 That looks like June 12th there was one</p> <p>21 filed?</p> <p>22 A. Yes.</p> <p>23 Q. Scrolling. Again, June 15th it looks</p> <p>24 like there was one entered?</p> |
| <p style="text-align: right;">Page 93</p> <p>1 Q. So that's where Health Service Request</p> <p>2 forms end, Outpatient Dental starts. I'm going to</p> <p>3 scroll through all these Health Service Request</p> <p>4 forms. I'm going to ask you some questions.</p> <p>5 Like we discussed, do you see the</p> <p>6 subject here is Health Service Request?</p> <p>7 A. Yes.</p> <p>8 Q. And you see this request is entered on</p> <p>9 June 4th of 2020?</p> <p>10 A. No, I don't see that. I can't see the</p> <p>11 date. Is it by where you got the mouse at? Where</p> <p>12 you're scrolling at?</p> <p>13 Q. I'll zoom in. Do you see where it</p> <p>14 says --</p> <p>15 A. I see it now.</p> <p>16 Q. Okay. So that says June 4th, 2020?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. So this is your first Health</p> <p>19 Service Request form for the month of June. And it</p> <p>20 goes all the way until the end of the Health</p> <p>21 Service Request forms in the Outpatient Dental.</p> <p>22 So this is the first page of the</p> <p>23 exhibit, right?</p> <p>24 A. Uh-huh.</p> | <p style="text-align: right;">Page 95</p> <p>1 A. Yes.</p> <p>2 Q. And June 22nd there's an entry?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And, again, June 29th there's an</p> <p>5 entry?</p> <p>6 A. Yes.</p> <p>7 Q. And now this is the first July date,</p> <p>8 right? This is July 1st, 2020?</p> <p>9 A. Yes, I see it.</p> <p>10 Q. Okay. And the next page is Outpatient</p> <p>11 Dental, and it regards May 20th, 2019, right?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And you said the incident</p> <p>14 happened on July 19th, 2020?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. So you did not see a Health</p> <p>17 Service Request form dated July 19th, 2020,</p> <p>18 correct?</p> <p>19 A. Correct, I didn't.</p> <p>20 Q. Or any Health Service Request form filed</p> <p>21 in the month of July, correct?</p> <p>22 A. No.</p> <p>23 Q. Okay. So did you not fill out a Health</p> <p>24 Service Request form for this incident?</p> |

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| <p style="text-align: right;">Page 96</p> <p>1 A. Yes, I filled out a health request form 2 for the incident because that's what I was told to 3 do. 4 Q. Okay. But you didn't -- 5 A. To go see the doctor, I had to fill out 6 a slip. 7 Q. But you didn't see one in your medical 8 records that I just showed you, correct? 9 A. You just only showed me July 19th, 2020. 10 I don't see anything else. 11 Q. I actually showed you July 1st, 2020, 12 right? 13 A. Okay. July 1st, 2020. 14 Q. And there's no other entry until the end 15 of the Health Service Request form? 16 MR. PRADOS: Let me object to foundation about 17 his understanding about how these digitized records 18 are put together. 19 But over that objection, he can answer, 20 if he can, these questions. 21 BY THE WITNESS: 22 A. Could you repeat the question? 23 BY MR. ZEID: 24 Q. I just said so I've shown you from the</p> | <p style="text-align: right;">Page 98</p> <p>1 questions here, Mr. Johnson. 2 I'm just going to pull up -- 3 A. Okay. I'm sorry. 4 Q. You're fine. I just want to keep us 5 moving. 6 So in your complaint, Mr. Johnson, you 7 wrote that because of your use of a cane, the 8 plaintiff, per Cook County Department of 9 Corrections policy and/or customs or practice, you 10 were not required to be handcuffed when you were 11 being escorted out of Division 8 for visitation. 12 Why do you believe you shouldn't have 13 been handcuffed? 14 A. Because that's what I was told. Once I 15 came to the medical unit and was issued a cane, the 16 doctors explained to me, you know, you don't have 17 to worry about being handcuffed because no one gets 18 handcuffed when they have a device to help their 19 mobility. And that's what went on. I wasn't 20 handcuffed -- 21 Q. I'm sorry to interrupt. I was just 22 going to ask, do you know which doctor told you 23 that? 24 A. I don't remember her name. It's when I</p> |
| <p style="text-align: right;">Page 97</p> <p>1 month of July -- July 1st, 2020, and the next page 2 switches subjects to Outpatient Dental dated 3 May 20th, 2019, right? 4 A. Yes. 5 MR. PRADOS: Same objection. 6 You can answer. 7 BY THE WITNESS: 8 A. I see that, yes. 9 BY MR. ZEID: 10 Q. Okay. Great. And so there was not a 11 Health Service Request form dated July 19th or 12 later, correct? 13 MR. PRADOS: Object as to form. 14 You can answer. 15 BY THE WITNESS: 16 A. I don't see that, but I put one in. So 17 I don't know why it's not there as far as a request 18 form -- the medical request form. 19 BY MR. ZEID: 20 Q. All right. That's all the questions I 21 have on that. 22 A. Because what I'm seeing, these are 23 doctors' -- those were doctors' documents, right? 24 Q. They were, but I'll just ask the</p> | <p style="text-align: right;">Page 99</p> <p>1 came from the hospital because I was in 2 Division 10, and I left there because my legs 3 collapsed on me and I had to go to the ER. And 4 when I came from the ER, the next day I went to the 5 medical unit, and the doctor that was there, she 6 looked at my chart, and she gave me where I was 7 going and prescriptions, and she said, you won't 8 have to worry about being cuffed because we got you 9 on the cane, and anybody get a device to help their 10 mobility don't get cuffed. So all while procedure 11 going through, I was not cuffed. 12 And then as we going along, because it 13 was long distance, I even had a wheelchair escort 14 put into my file. So, I mean, basically, I should 15 have been escorted, you know, or if -- even to look 16 for a wheelchair to escort me, you know. But that 17 didn't happen. 18 Q. Do you know what the policy regarding 19 the control of inmate movement is at Cook County 20 Jail? 21 A. Not really. 22 MR. PRADOS: Objection as to form. 23 But you can answer. 24</p> |

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| <p style="text-align: right;">Page 100</p> <p>1 BY THE WITNESS:</p> <p>2 A. I'm not sure about it, but I was told</p> <p>3 that -- well, I heard that detainees get handcuffed</p> <p>4 requiring movement, but I haven't gotten</p> <p>5 handcuffed.</p> <p>6 BY MR. ZEID:</p> <p>7 Q. But you didn't write the policy for Cook</p> <p>8 County Jail about controlled movement, right?</p> <p>9 A. No, I didn't write it. I didn't even</p> <p>10 read it. I just know when an officer will explain</p> <p>11 the movement for detainees.</p> <p>12 MR. ZEID: I'm going to introduce to you what</p> <p>13 will be Exhibit 4. It's Bates-stamped 62 through</p> <p>14 63, and it's Cook County Policy 708.</p> <p>15 (WHEREUPON, a certain document was</p> <p>16 marked Defense Exhibit No. 4, for</p> <p>17 identification, as of 2-6-24.)</p> <p>18 BY MR. ZEID:</p> <p>19 Q. Let me know if you can see my screen</p> <p>20 here, Mr. Johnson.</p> <p>21 A. I can see the screen.</p> <p>22 Q. I'm just going to scroll through the</p> <p>23 document. It's two pages.</p> <p>24 You have not seen this document prior to</p> | <p style="text-align: right;">Page 102</p> <p>1 A. Start where it says 4?</p> <p>2 Q. Where it says Inmates.</p> <p>3 A. "Inmates should be restrained during</p> <p>4 movement based upon individual security" -- what's</p> <p>5 that? Defecation?</p> <p>6 Q. Classification.</p> <p>7 A. Okay. It's kind of blurred.</p> <p>8 "-- classification. Higher risk inmates in</p> <p>9 handcuffs, wrist chains, and leg irons. An</p> <p>10 exception to this procedure is when an inmate has</p> <p>11 a -- procedure is when an inmate has a physical</p> <p>12 disability where restraint devices may cause</p> <p>13 serious injury. Pregnant inmates shall be moved in</p> <p>14 accordance with the use of restraints policy."</p> <p>15 Q. Perfect. I'm going to stop sharing my</p> <p>16 screen here.</p> <p>17 Mr. Johnson, do you know what the policy</p> <p>18 regarding the use of restraints is at Cook County</p> <p>19 Jail?</p> <p>20 A. As they say, for safety matters.</p> <p>21 Q. Could you tell me what it is?</p> <p>22 MR. PRADOS: Objection to foundation.</p> <p>23 If he knows, he can answer.</p> <p>24</p> |
| <p style="text-align: right;">Page 101</p> <p>1 right now, correct?</p> <p>2 A. No.</p> <p>3 Q. Okay. So you didn't have a copy of this</p> <p>4 document on July 19th, 2020?</p> <p>5 A. No, I did not.</p> <p>6 MR. PRADOS: Objection.</p> <p>7 You can answer.</p> <p>8 BY MR. ZEID:</p> <p>9 Q. Okay. I'm going to scroll down to</p> <p>10 Policy 708.4, Movement of Inmates, and I'm just</p> <p>11 going to have you read Paragraph 2, which I'll</p> <p>12 highlight here -- or I'll put my mouse by it so you</p> <p>13 can see where my mouse is.</p> <p>14 A. Okay. You're gonna have to blow it up a</p> <p>15 little bit because I can't see the little writing</p> <p>16 because I don't have my glasses.</p> <p>17 Q. Completely understand. I'm going to</p> <p>18 blow it up right now.</p> <p>19 A. Right there.</p> <p>20 Q. If you need me to scroll to the right at</p> <p>21 any point, just let me know.</p> <p>22 A. Just point to me where I need to read.</p> <p>23 Q. Start here, and it will just be this</p> <p>24 paragraph.</p> | <p style="text-align: right;">Page 103</p> <p>1 BY THE WITNESS:</p> <p>2 A. No, I don't really know.</p> <p>3 MR. ZEID: Okay. I'm going to introduce what</p> <p>4 will be marked as Exhibit 5. It's Bates-stamped</p> <p>5 156 through 163, and it's Cook County Policy 709 on</p> <p>6 the use of restraints.</p> <p>7 (WHEREUPON, a certain document was</p> <p>8 marked Defense Exhibit No. 5, for</p> <p>9 identification, as of 2-6-24.)</p> <p>10 BY MR. ZEID:</p> <p>11 Q. Let me know when you can see the</p> <p>12 document just like before.</p> <p>13 A. Yes, I see it.</p> <p>14 Q. I'm just going to scroll to the top so</p> <p>15 you can see where it starts. I'll scroll all the</p> <p>16 way through the document. There's eight pages</p> <p>17 total.</p> <p>18 So we got to Page 8, and that's the end</p> <p>19 of the exhibit.</p> <p>20 A. Okay.</p> <p>21 Q. You have not seen this document prior to</p> <p>22 today, correct?</p> <p>23 A. No, I haven't.</p> <p>24 Q. Okay. I'm going to scroll to Page 3 and</p> |

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| <p style="text-align: right;">Page 104</p> <p>1 just have you read the first line of Policy</p> <p>2 708.3.1, Use of Restraints on Disabled Subjects.</p> <p>3 A. Could you blow it up?</p> <p>4 Q. Yes. Is this any better?</p> <p>5 A. Okay. It says, "A physical disability</p> <p>6 (eg, visually impaired, hearing impaired,</p> <p>7 paraplegic) does not preclude the use of restraints</p> <p>8 on an inmate."</p> <p>9 MR. ZEID: Okay. I'm going to stop sharing my</p> <p>10 screen here, and I'll take this exhibit down.</p> <p>11 And I'm going to pull up what will be</p> <p>12 marked as Exhibit 6. It's going to be Plaintiff's</p> <p>13 Cook County Jail Bates-stamped 66. It's going to</p> <p>14 look like an Excel spreadsheet.</p> <p>15 (WHEREUPON, a certain document was</p> <p>16 marked Defense Exhibit No. 6, for</p> <p>17 identification, as of 2-6-24.)</p> <p>18 BY MR. ZEID:</p> <p>19 Q. So let me know if you can see it, okay?</p> <p>20 A. I see it.</p> <p>21 Q. I'll zoom in a little bit.</p> <p>22 Mr. Johnson, you previously mentioned</p> <p>23 that you shouldn't have been handcuffed because you</p> <p>24 were supposed to have a wheelchair, correct?</p> | <p style="text-align: right;">Page 106</p> <p>1 medical infirmary." Do you see that?</p> <p>2 A. Yes. I can see a little bit, but it's</p> <p>3 blurry, unless you blow it up.</p> <p>4 MR. PRADOS: Also just a standing objection as</p> <p>5 to foundation with respect to this log of medical</p> <p>6 alerts. But if he knows, to the extent he can</p> <p>7 answer your questions, he can answer your question.</p> <p>8 I suggest you might adjust the width of</p> <p>9 the columns for the dates because then you can</p> <p>10 actually see the dates.</p> <p>11 MR. ZEID: We'll get there. I'll zoom in to</p> <p>12 each of them.</p> <p>13 BY THE WITNESS:</p> <p>14 A. Okay. What am I looking at?</p> <p>15 BY MR. ZEID:</p> <p>16 Q. So you see that Column G right here,</p> <p>17 Mr. Johnson?</p> <p>18 A. Yes. Yes, I do.</p> <p>19 Q. Do you see under it, it says, "Alert"?</p> <p>20 A. Uh-huh.</p> <p>21 Q. Okay. So I'm just going to have you</p> <p>22 look at all of these, and tell me if you see</p> <p>23 wheelchair anywhere else other than Line 7, okay?</p> <p>24 Because it says wheelchair by Line 7.</p> |
| <p style="text-align: right;">Page 105</p> <p>1 A. No, because I was on a cane. I</p> <p>2 mentioned a wheelchair -- I mentioned a wheelchair</p> <p>3 was for long distance. I got that in my medical</p> <p>4 file there for if I need -- for long distance, I</p> <p>5 can request a wheelchair escort, meaning that the</p> <p>6 officer supposed to look for a wheelchair and get</p> <p>7 it and escort me to my long distance. Like to</p> <p>8 court, like to visiting. Any long distance, that's</p> <p>9 where the wheelchair came in at.</p> <p>10 Q. Got it. Okay. And so are you saying</p> <p>11 that's what should have happened in this situation?</p> <p>12 A. I'm asking -- I'm saying -- I'm replying</p> <p>13 that when I mentioned that to him, as well as me</p> <p>14 being on the cane, I had a wheelchair escort in my</p> <p>15 file. He didn't go to look for it to find out</p> <p>16 because if he'd have looked, he'd have seen it, and</p> <p>17 I could have got a wheelchair escort. But that</p> <p>18 wasn't on his mind as I seen because as I was</p> <p>19 explaining it to him, he didn't care. As he state,</p> <p>20 well, you gonna get cuffed today.</p> <p>21 Q. Mr. Johnson, I'm going to show you -- do</p> <p>22 you see this column titled Alerts down here?</p> <p>23 A. I see where you got the mouse on it.</p> <p>24 Q. And below it, "Cast/splint, inhaler,</p> | <p style="text-align: right;">Page 107</p> <p>1 A. Right.</p> <p>2 Q. Do you see wheelchair anywhere else?</p> <p>3 A. No.</p> <p>4 Q. All right. I'm going to scroll down so</p> <p>5 you can see all orders in here.</p> <p>6 Do you see wheelchair anywhere else?</p> <p>7 A. No.</p> <p>8 Q. Okay. So Line 7 is the only line that</p> <p>9 has wheelchair listed under Alerts, right?</p> <p>10 A. Yeah. I see to my knowledge, yeah.</p> <p>11 Q. Okay. So I'm going to move over to --</p> <p>12 do you see the column to the right that says</p> <p>13 Effective Date, where my mouse is?</p> <p>14 A. Yes. What am I looking at? I see</p> <p>15 wheelchair long distance only.</p> <p>16 Q. Okay. And then you see where my mouse</p> <p>17 is?</p> <p>18 A. Yes, I see it.</p> <p>19 Q. Okay. And you see it says Effective</p> <p>20 Date there?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. I'm going to go to Line 7 under</p> <p>23 Effective Date and click, and tell me what the date</p> <p>24 that's there is.</p> |

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| <p style="text-align: right;">Page 108</p> <p>1 A. That says 6/15/2021.</p> <p>2 Q. So the effective date of your wheelchair</p> <p>3 long distance only alert says 6/15/2021?</p> <p>4 A. Uh-huh.</p> <p>5 Q. Okay. And this incident occurred on</p> <p>6 July 19th, 2020, correct?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Mr. Johnson, can you hear me?</p> <p>9 A. Yes, I can hear you.</p> <p>10 Q. Okay. I'm just going to start over.</p> <p>11 I said do you believe that inmates with</p> <p>12 dangerous objects should be allowed to walk around</p> <p>13 Cook County Jail without restraints?</p> <p>14 A. No, they shouldn't.</p> <p>15 Q. Okay. You previously stated you had a</p> <p>16 cane when you were handcuffed in escort to and from</p> <p>17 your visitation, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And you can actually see -- I'm</p> <p>20 going to scroll to Line 16 here, and you can see it</p> <p>21 says Cane under Alert, correct?</p> <p>22 A. Yeah. What now? I see cane.</p> <p>23 Q. Yeah, so you see that under Alert under</p> <p>24 Line 16?</p> | <p style="text-align: right;">Page 110</p> <p>1 A. Yes. Wherever -- any time my cane</p> <p>2 expired, the doctor reevaluated it, reissued it out</p> <p>3 for the date for the the next time. They redid it.</p> <p>4 That's why I had my cane throughout the facility.</p> <p>5 I never got my cane taken from me because I needed</p> <p>6 it. So it was never taken from me.</p> <p>7 Q. So that's all to say you had the cane</p> <p>8 the whole time of the incident?</p> <p>9 A. Yes, the whole time.</p> <p>10 Q. Okay. And do you consider a cane a</p> <p>11 weapon?</p> <p>12 A. No, I do not. But to show disability,</p> <p>13 you have to -- you know, if there's a person using</p> <p>14 it that needs it, he's not a threat. But if a</p> <p>15 person just got it just to use it as a weapon, then</p> <p>16 that's what you consider a threat. I wasn't</p> <p>17 considered a threat because I feel if I was a</p> <p>18 threat, every time I would call to go somewhere, I</p> <p>19 would have been handcuffed.</p> <p>20 Q. So a cane could be used as a weapon?</p> <p>21 A. Yes, it --</p> <p>22 MR. PRADOS: Objection, incomplete</p> <p>23 hypothetical. Objection also as to form.</p> <p>24 But you can answer.</p> |
| <p style="text-align: right;">Page 109</p> <p>1 A. No. I just see cane. You got the cane.</p> <p>2 Q. Do you see Line 16 is next to that</p> <p>3 column?</p> <p>4 A. Line 16 is next to my -- it's next to my</p> <p>5 name where you got it highlighted. It's a medical</p> <p>6 cane.</p> <p>7 Q. Okay. And to the right of the cane it</p> <p>8 says, "Ranking alert 10," right?</p> <p>9 A. No. You got a list of numbers, 10, 5,</p> <p>10 with like 10, 05.</p> <p>11 Q. What is the alert right here?</p> <p>12 MR. PRADOS: Object to form.</p> <p>13 BY THE WITNESS:</p> <p>14 A. That's just the thing. I'm not</p> <p>15 seeing -- what are you showing me? I see where you</p> <p>16 got it lit up, but the only thing it's showing is</p> <p>17 the date and a time.</p> <p>18 BY MR. ZEID:</p> <p>19 Q. Okay. And what does it say the date is?</p> <p>20 A. It says the date 12/8/2020 -- no, 2019,</p> <p>21 2:01 p.m.</p> <p>22 Q. Okay. So the effective date of your</p> <p>23 cane alert was 12/8/2019, and it's set to expire on</p> <p>24 12/9/2021, right?</p> | <p style="text-align: right;">Page 111</p> <p>1 BY MR. ZEID:</p> <p>2 Q. Mr. Johnson, can a cane be used as a</p> <p>3 weapon?</p> <p>4 MR. PRADOS: Same objection.</p> <p>5 You can answer.</p> <p>6 BY THE WITNESS:</p> <p>7 A. Yes.</p> <p>8 BY MR. ZEID:</p> <p>9 Q. Okay. Have you ever seen anyone use a</p> <p>10 cane as a weapon?</p> <p>11 MR. PRADOS: Objection, relevance.</p> <p>12 You can answer.</p> <p>13 BY THE WITNESS:</p> <p>14 A. Yes, I have.</p> <p>15 BY MR. ZEID:</p> <p>16 Q. Okay. Have you seen them use it as a</p> <p>17 weapon at Cook County Jail?</p> <p>18 MR. PRADOS: Same objection.</p> <p>19 You can answer.</p> <p>20 BY THE WITNESS:</p> <p>21 A. Yes.</p> <p>22 BY MR. ZEID:</p> <p>23 Q. Can you describe that incident, please?</p> <p>24 MR. PRADOS: Objection, relevance.</p> |

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| <p style="text-align: right;">Page 112</p> <p>1 Over that objection, you can answer.</p> <p>2 BY THE WITNESS:</p> <p>3 A. Okay. I've seen it used in a brawl. I</p> <p>4 mean, the guys, they call, the debt went up, as</p> <p>5 they say. I mean, I don't understand it, but</p> <p>6 that's what it meant. The debt went up. That</p> <p>7 means some guys got into a fight over in the</p> <p>8 area -- in the dayroom or in the bathroom. But I</p> <p>9 just seen someone that was issued a cane that</p> <p>10 didn't even need the cane. And as time and days</p> <p>11 went by, as they was reviewing on video, the nurses</p> <p>12 came and took the cane because they seen that they</p> <p>13 didn't need it.</p> <p>14 But I needed mine, and I didn't have no</p> <p>15 reason to use it as a weapon because I'm not a</p> <p>16 violent person.</p> <p>17 MR. ZEID: Well, I think that concludes all</p> <p>18 the questions I have, Mr. Johnson. But I know --</p> <p>19 I'm sure Jason has questions as well. So I will go</p> <p>20 ahead and end my part of the deposition and pass it</p> <p>21 to defense counsel here.</p> <p>22 EXAMINATION</p> <p>23 BY MR. DEVORE:</p> <p>24 Q. Good afternoon. I just have a couple</p> | <p style="text-align: right;">Page 114</p> <p>1 feel it, but he wasn't concerned about that.</p> <p>2 Q. And when you -- when Officer Bacon was</p> <p>3 putting on the handcuffs, at that time did you ask</p> <p>4 him or did you suggest to him that you had a</p> <p>5 wheelchair alert?</p> <p>6 A. Yes, I was explaining all that to him</p> <p>7 before he put the handcuffs on. But when I got</p> <p>8 finished explaining that to him, he said, well, you</p> <p>9 gonna get handcuffed today, and he handcuffed me.</p> <p>10 Q. And at the time when you were having</p> <p>11 this conversation, were there any other officers or</p> <p>12 detainees in the immediate area?</p> <p>13 A. No.</p> <p>14 Q. And do you know if the handcuffs have</p> <p>15 any additional locking mechanism to make it so the</p> <p>16 handcuffs don't get too tight?</p> <p>17 A. No. I'm not aware of that.</p> <p>18 Q. Okay. And I believe you described</p> <p>19 there's a handcuff, then a chain, and then another</p> <p>20 handcuff as well, correct?</p> <p>21 A. Right. Normal handcuffs, you know.</p> <p>22 Q. About how long was the chain?</p> <p>23 A. Maybe -- not a good foot. I mean, I</p> <p>24 guess maybe inches. Between -- I'd say between</p> |
| <p style="text-align: right;">Page 113</p> <p>1 questions in relation to Mr. Bacon putting the</p> <p>2 handcuffs on you.</p> <p>3 Did Officer Bacon -- did he check the</p> <p>4 handcuffs in any way when he was applying them on</p> <p>5 your wrists?</p> <p>6 A. No, he didn't. He just clamped them on</p> <p>7 me, click, and say, let's go. Never was they loose</p> <p>8 or tight. He just clamped them on me.</p> <p>9 Q. Can you recall if he put them on -- the</p> <p>10 handcuffs on your right hand first or your left</p> <p>11 hand first?</p> <p>12 A. I don't remember. That, I don't</p> <p>13 remember.</p> <p>14 Q. Okay.</p> <p>15 A. I don't know which hand he put them on</p> <p>16 first, but I remember he clamped them down. But as</p> <p>17 we proceed, as we walking to the elevator, I'm</p> <p>18 telling him that they tight.</p> <p>19 Q. So when he put the first cuff on, was it</p> <p>20 a single click, or was it like a click, click,</p> <p>21 click, or do you remember?</p> <p>22 A. No, it wasn't just a single click, no.</p> <p>23 Then I would know. It was click, click, click.</p> <p>24 Click, click, click, which I know did -- I could</p> | <p style="text-align: right;">Page 115</p> <p>1 three to five inches. Something like that. Three</p> <p>2 inches.</p> <p>3 MR. DEVORE: That's all I have.</p> <p>4 MR. PRADOS: I don't have very many questions,</p> <p>5 but I have to ask for another ten-minute break so I</p> <p>6 can look over my notes. If we can reconvene at</p> <p>7 1:21.</p> <p>8 MR. ZEID: That works for me.</p> <p>9 MR. PRADOS: Mr. Johnson, you can mute</p> <p>10 yourself again, please.</p> <p>11 (WHEREUPON, a recess was had.)</p> <p>12 MR. ZEID: We're back at 1:21.</p> <p>13 EXAMINATION</p> <p>14 BY MR. PRADOS:</p> <p>15 Q. We're now back on the record. The time</p> <p>16 is 1:21 p.m. I might just have a few questions for</p> <p>17 you, Douglas.</p> <p>18 You testified earlier today about some</p> <p>19 deposition dates -- or you had been deposed once</p> <p>20 before, and I think you said around 2001.</p> <p>21 Do you mean 2021?</p> <p>22 A. Yes, 2021, yes.</p> <p>23 Q. Okay. And, again, on the 17th, as you</p> <p>24 were going to this visit, were you worried that</p> |

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| <p style="text-align: right;">Page 116</p> <p>1 your family would be worried if you didn't show up 2 for the visit? 3 A. Yeah. They would be worried. 4 Q. Was that part of the motivation that 5 made you want to complete the visit? 6 A. Yes. 7 Q. While you were in the visitors area, you 8 knew that you would have to wait for Bacon to 9 return before you could go back to your division, 10 right? 11 A. Yes. 12 Q. So you were dependent on his schedule, 13 basically? 14 A. Yes. 15 Q. You weren't able to go back to your 16 housing by yourself, correct? 17 A. No. I had to be escorted to my housing. 18 Q. And you had to be escorted by the same 19 personnel that took you out, is your understanding? 20 A. Yes. 21 Q. Okay. What did your hands and wrists 22 look like when you got to the visiting area? 23 A. They were red and swollen. 24 Q. Were they -- did your family immediately</p> | <p style="text-align: right;">Page 118</p> <p>1 A. Yes. 2 Q. Did he laugh or chuckle? 3 A. Yes, he did. 4 Q. And how many times did he laugh or 5 chuckle as he was escorting you through the tunnel? 6 A. I'd say maybe four or five times on the 7 way there, and basically the same on the way back. 8 Q. He would pause and look back? 9 A. Yes. 10 Q. You were walking in short stages, 11 correct? 12 A. Yes. 13 Q. Can you describe that process a little 14 bit more? 15 A. I was just walking. I wasn't walking 16 fast because I was taking little steps because the 17 first few steps I took on the way there, I 18 stumbled. Basically, I kind of stumbled, tripping 19 over my cane. So I started going slow up against 20 the wall, just moving slow, at a slow pace. My 21 whole body, my right side, was against the wall. I 22 had the cane on the right side as well. 23 Q. When you took your little pauses, would 24 you ask Bacon to loosen your cuffs or remove them?</p> |
| <p style="text-align: right;">Page 117</p> <p>1 notice that there was something wrong with your 2 wrists? 3 A. Yes. 4 Q. Would it take some special medical 5 expertise to figure out there was something wrong 6 with your wrists, or were they so screwed up that 7 everyone could tell there was something wrong? 8 A. Everyone could tell that something was 9 wrong. 10 Q. Did your hands look puffy, or can you 11 describe the swelling in more detail? 12 A. They were puffy. My wrist was puffy, 13 and my finger right by my thumb area, and my hands 14 were real red. 15 Q. Were both of your hands very red? 16 A. Yes. 17 Q. Okay. You described in your previous 18 testimony today Defendant Bacon smirking and having 19 a crazy smile as he was escorting you, is that 20 right? 21 A. Yes. Throughout the whole journey and 22 back. 23 Q. Was he smiling as if he was enjoying 24 your ordeal?</p> | <p style="text-align: right;">Page 119</p> <p>1 A. I did twice. 2 Q. Okay. And what did he say to those 3 requests? 4 A. He said no, they not tight. The second 5 time, he replied, no, they not tight. I could fit 6 my whole damn hand in the cuff. 7 Q. Okay. 8 A. Just, come on. 9 Q. And did he say that with the same smirk 10 you described before? 11 A. Yes. 12 Q. Okay. Is it difficult to talk while 13 you're having an asthma attack? 14 A. A little, you know. All depends on the 15 stages of it. But when it got to my stage, I was 16 able to -- I could have talked a little bit, but I 17 was -- I mean, the anger, what he done. 18 Q. You had the full-blown asthma attack at 19 the end of the process, right, when you were 20 back -- 21 A. Yes. 22 Q. -- in Division 8? 23 A. Yes. 24 Q. And at that point did you think it was</p> |

32 (Pages 116 to 119)

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| <p>1 futile to ask him to -- to beg him to take off your 2 cuffs? 3 A. Well, I basically didn't have to ask, 4 you know. I just put my hands up, and he just took 5 them off with the same smirk smile on his face. 6 Once he took them off, he left. 7 Q. Okay. And then you ran cold water on 8 the wrists? 9 A. Yes, I ran cold water on the wrists 10 after I pulled my mask down and took two puffs of 11 my inhaler. 12 Q. Okay. Did the cold water make them feel 13 better at all? 14 A. Just a little bit. It felt a little 15 bit. But the sting was still there, you know. So 16 I just took my hands off the water, dried them off, 17 and went to talk to the tier officer. 18 Q. Was the pain initially in both hands 19 when you removed the handcuffs? 20 A. Yes. The pain was initially in both 21 hands, but it was, like, the right hand and wrist 22 was throbbing. So once I left the sink that it was 23 throbbing and it was swollen, then I knew that 24 something was wrong. My left hand, it was just</p> | <p>1 showed her my wrists, you know. And she said, oh, 2 that looks bad. I'm, like, yeah, one of your 3 officers handcuffed me real tight and had me to 4 walk all the way to Division 1 and back. 5 Q. And what did she say? 6 A. And what she did, I don't know, because 7 when she went, she said, hold up, and she walked 8 away, and then she came back, you know. And she 9 said, I'm sorry this happened to you. When I 10 walked away, I was checking to see your status for 11 being handcuffed. And she was saying, I didn't see 12 it, you know, on no note or nothing like that. You 13 know, so what you gonna do is you can fill out a 14 grievance because I see that your arm and your 15 wrist -- your hand and your wrist is injured, and 16 I'm gonna find Officer Bacon, and I'm gonna make 17 sure he be disciplined. 18 Q. Okay. This event happened at the height 19 of COVID, in the summer of 2020, right? 20 A. Yes. 21 Q. And so were there fewer visits earlier 22 in the year because of the pandemic? 23 A. The pandemic, there wasn't no visits -- 24 no outside visits like that. It was, like, Zoom.</p> |
| Page 121 | Page 123 |
| <p>1 hurting a little bit, but the main issue was my 2 right hand and wrist because it was swollen and to 3 the point where it was pushing on my vein here. 4 Q. So in terms of correctional personnel 5 that were on the scene when you got back there, who 6 was present? 7 A. The officer -- tier officer. His name 8 was Orr. 9 Q. Okay. And what did he say to you when 10 he saw your wrist? 11 A. He just said I knew something was wrong. 12 Your wrist is swollen. I could see the swelling. 13 And I asked him to speak with a supervisor. 14 Q. Okay. And had you seen Orr before? 15 A. Yes, I've seen him before. He comes 16 from time to time. I guess substitute when the 17 original officer on the tier, I guess, call in or 18 whatever. 19 Q. Okay. Had he ever facilitated your 20 escort to the visiting area? 21 A. No. 22 Q. Okay. And what did Parcell say when she 23 arrived? 24 A. She asked me what was wrong, and I</p> | <p>1 Q. Okay. So then at some point in-person 2 visits became possible again in 2020, correct? 3 A. Yes. 4 Q. And about how many visits had you had 5 prior -- in-person visits had you had prior to 6 July 19th, 2020? 7 A. I had, like, either three or four. 8 Q. Okay. 9 A. Probably about four. I'd say about 10 four. 11 Q. And on any of those occasions did they 12 handcuff you as they took you to Division 1? 13 A. No. 14 Q. Were you handcuffed at all in 2020 prior 15 to July 19th, 2020? 16 A. No. 17 Q. And did guards repeatedly explain to you 18 that that was because of your cane? 19 A. No guards. They didn't -- they didn't 20 say anything. When I went out there, they just 21 say, come on. You know, you on a cane. And we 22 proceeded to go where I needed to go. I didn't get 23 handcuffed until later on in the year when they was 24 switching officers and I was having a Zoom visit,</p> |

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| <p style="text-align: right;">Page 124</p> <p>1 and I didn't have no handcuffs. And the guy came, 2 and he said, you supposed to be handcuffed, you 3 know. And I was explaining about my braces. He 4 said, I don't care about the braces. Give him some 5 handcuffs. Get the big handcuffs and just put it 6 on real light, and keep the hands in the front. 7 Q. And these other handcuffs were put on 8 after the incidents described in this complaint? 9 A. Yes. 10 Q. And it was a special set of handcuffs 11 that they placed on you, is that right? 12 A. Yes, special set of handcuffs. They 13 were some giant handcuffs. I guess maybe they go 14 on the feet or something like that. I don't know. 15 But they were big handcuffs. 16 Q. And these handcuffs put less pressure on 17 your hands, on your wrists? 18 A. Right, right. 19 Q. Okay. And at some point prior to 20 July 19th, 2020, you had been wheelchaired between 21 divisions, correct? 22 A. Yes. 23 Q. Had you ever been handcuffed while you 24 were wheelchaired?</p> | <p style="text-align: right;">Page 126</p> <p>1 from what guards have done and said, correct? 2 A. Exactly. 3 Q. And you found Officer Bacon's conduct 4 very surprising on July 19th, 2020, correct? 5 A. Yes, I did. 6 Q. Okay. And did Orr communicate to you 7 that he thought Officer Bacon had made some error 8 in how he escorted you? 9 A. Yes. He made the statement that I 10 shouldn't have been handcuffed because I had a 11 cane. 12 Q. Okay. Then did Parcell say anything 13 along those lines? 14 A. She replied, but then she -- like I 15 said, she left, and I guess she went to try to find 16 some type of something in the computer real quick. 17 But then she came back, and she just, you know, 18 explained that was wrong, you know, what he did to 19 me, and he would be disciplined. 20 Q. Okay. And you testified earlier today 21 that you had had problems with your right wrist 22 prior to July 19th, 2020, correct? 23 A. Yes. 24 Q. So if there's any statement in the</p> |
| <p style="text-align: right;">Page 125</p> <p>1 A. No. 2 Q. Okay. And on some other occasions you 3 were brought from Division 8 to Division 1 on your 4 own -- by your own -- on your own two feet with a 5 cane, correct? 6 A. Yes. 7 Q. But you did not have handcuffs, right? 8 A. I didn't have no handcuffs. 9 Q. And can you explain why it's easier to 10 walk with a cane without handcuffs, if it is? 11 A. Without handcuffs? 12 Q. Yeah. 13 A. Because I'm able -- even though I'm 14 struggling with the pain, I'm able to balance 15 myself. And it's walking with the cane in one 16 hand, and I'm walking with my other hand freely, 17 you know, just in case my legs buckle so I can 18 catch myself. 19 Q. You were shown some written policies 20 that the sheriff has promulgated with regard to 21 restraining detainees earlier in this deposition. 22 Had you ever seen those before? 23 A. No. 24 Q. So your understanding of policy comes</p> | <p style="text-align: right;">Page 127</p> <p>1 complaint that was filed in this lawsuit that says 2 otherwise, that your right wrist was perfectly fine 3 beforehand, is that an error your lawyers made? 4 A. Yes. 5 MR. PRADOS: Okay. I don't have anything 6 else. 7 FURTHER EXAMINATION 8 BY MR. ZEID: 9 Q. Just one minor correction just for the 10 record. 11 Mr. Johnson, you were asked on July 17th 12 when you had visited your family, and I just wanted 13 to correct and state the incident was on July 19th, 14 right? 15 A. Exactly correct. 16 MR. ZEID: No further questions. Jason, if 17 you have anything else. If not, I'm all done. 18 MR. DEVORE: Nope. I have nothing further. 19 Thank you. 20 MR. PRADOS: Thank you very much. We waive. 21 MR. ZEID: Great. We'll go ahead and order a 22 copy then. 23 THE COURT REPORTER: Does anybody need a copy? 24 MR. PRADOS: Can I have your contact</p> |

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1 information, Karen?
2 THE COURT REPORTER: It's
3 info@royalreporting.com.
4 MR. PRADOS: Okay. And are you Chicago-based?
5 MR. ZEID: Yes.
6 MR. PRADOS: It's info@royalreporting.com?
7 THE COURT REPORTER:
8 info@royalreportingservices.com.
9 Are you going to send the exhibits?
10 MR. ZEID: I will, Karen. I'll email them.
11 (The deposition concluded at 1:40 p.m.)
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1 I, KAREN A. FAZIO, CSR No. 84-1834, a
2 Notary Public within and for the County of Cook,
3 State of Illinois, and a Certified Shorthand
4 Reporter of said state, do hereby certify:

5
6 That previous to the commencement of the
7 examination of the witness, the witness was duly
8 sworn to testify the whole truth concerning the
9 matters herein;

10
11 That the foregoing deposition transcript
12 was reported stenographically by me, was thereafter
13 reduced to typewriting under my personal direction
14 and constitutes a true record of the testimony
15 given and the proceedings had;

16
17 That the said deposition was taken
18 remotely before me on the date and time specified;

19
20 That I am not a relative or employee or
21 attorney or counsel, nor a relative or employee of
22 such attorney or counsel for any of the parties
23 hereto, nor interested directly or indirectly in
24 the outcome of this action.

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1 IN WITNESS WHEREOF, I do hereunto set my
2 hand of office at Chicago, Illinois, this 28th day
3 of February, 2024.

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KAREN A. FAZIO, CSR No. 84-1834

11

Notary Public, Cook County, Illinois.

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My commission expires 5/10/24

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